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January 27, 2015

Veridiam, Inc  
C/O Registered Agent  
818 West Seventh St 2<sup>nd</sup> FL  
Los Angeles, CA 90017

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Clerk of the Board of Supervisors  
1600 Pacific Highway, Room 402  
San Diego, California 92101

**Re: Notice of Violation and Intent to File Clean Water Act Citizens' Suit**  
**[33 U.S.C. § 1365] 60-Day Notice**

Dear Mr. Hollander and Clerk of the Board,

Please accept this letter on behalf of Coastal Environmental Rights Foundation ("CERF" or "Citizen Group") regarding violations of the Federal Water Pollution Control Act (Clean Water Act) occurring at the Veridiam Facility located at 1717 Cuyamaca St, El Cajon, CA 92020 (WDID No. 937I020299). This letter constitutes the CERF's notice of intent to sue for violations of the Clean Water Act and National Pollution Discharge Elimination System (NPDES) Permit No. CAS000001 (General Industrial Permit), as more fully set forth below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator and various agency officials. (33 U.S.C. § 1365(b)(1)(A)). In compliance with section 1365, this letter provides notice of the Veridiam Facility's violations and of CERF's intent to sue.

**I. BACKGROUND**

**A. The Veridiam Facility**

Veridiam, Inc owns and operates a facility located at 1717 Cuyamaca St, El Cajon, CA 92020 ("Veridiam Facility" or "Facility"). The Veridiam Facility has been in operation at this location since at least 2006. Veridiam conducts metal tubing, electrical discharge machining, electro chemical sharpening, swiss style turning, laser cutting, alloy fabrication, and other metal fabrication services. Veridiam, Inc leases the Facility from the County of San Diego.

The owners and operators of the aforementioned Facility operating at 1717 Cuyamaca Street, Veridiam, Inc and County of San Diego, are collectively referred to herein as the "Veridiam Facility Owners and/or Operators."



## **B. Storm Water Pollution From Industrial Facilities**

Storm water pollution results from materials and chemicals washed into the storm drains from streets, gutters, neighborhoods, industrial sites, parking lots and construction sites. This type of pollution is significant because storm water is often untreated and flows directly to receiving waters, including lakes, rivers, or ultimately the ocean. Storm water runoff associated with industrial facilities in particular has the potential to negatively impact receiving waters and contributes to the impairment of downstream water bodies. Industrial areas are known to result in excessive wet-weather storm water discharges, as well as contaminated dry weather entries into the storm drain system.<sup>1</sup>

Pollutants associated with Sector AA (Fabricated Metal Products) include total suspended solids, oil and grease, spent solvents, metals, paints, heavy metals, nitrates, gas and diesel fuel and fuel additives, and other pollutants. (See Exhibit A, Industrial Stormwater Fact Sheet, Sector AA).

## **C. Forester Creek, San Diego River, Pacific Ocean**

Forester Creek is on the 303(d) list as impaired for numerous constituents, including fecal coliform, selenium, total dissolved solids, and pH. The San Diego River is also impaired for numerous constituents, including toxicity.

## **D. Discharges From Veridiam Facility**

Polluted discharges from the Veridiam Facility flow into Forester Creek, a tributary to the San Diego River, and ultimately to the Pacific Ocean. The Facility has been enrolled under the General Industrial Permit since 2006. According to the most recent Annual Report, the Facility has four or five discharge locations to Forester Creek.

## **E. Citizen Group: Coastal Environmental Rights Foundation**

CERF is a California nonprofit public benefit corporation founded by surfers dedicated to the protection, preservation and enhancement of the environment, wildlife, natural resources, local marine waters and other coastal natural resources. CERF's interests are and will be adversely affected by the Veridiam Facility Owners and/or Operators' actions. CERF's mailing address is 1140 S. Coast Highway 101, Encinitas, CA 92024. Its telephone number is (760) 942-8505.

Members of CERF use and enjoy the waters into which pollutants from the Veridiam Facility's ongoing illegal activities are discharged, including Forester Creek, the San Diego River and the Pacific Ocean. The public and members of CERF use these receiving waters to fish, sail, boat, kayak, surf, stand-up paddle, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the Veridiam Facility affects and impairs each of these uses. Thus, the interests of CERF's members have been, are being, and

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<sup>1</sup> *Illicit Discharge Detection and Elimination: Technical Appendices*, Appendix K, Specific Considerations for Industrial Sources of Inappropriate Pollutant Entries to the Storm Drainage System (Adapted from Pitt, 2001)





will continue to be adversely affected by the Veridiam Facility Owners and/or Operators' failure to comply with the Clean Water Act and the General Industrial Permit.

## **II. CLEAN WATER ACT VIOLATIONS**

The Clean Water Act (CWA) was amended in 1972 to provide that the discharge of pollutants to waters of the United States from any point source is effectively prohibited unless the discharge is in compliance with an NPDES permit. The 1987 amendments to the CWA added Section 402(p) that establishes a framework for regulating municipal and industrial storm water discharges under the NPDES Program. In 1990, US EPA published final regulations that require storm water associated with industrial activity that discharges either directly to surface waters or indirectly through municipal separate storm sewers be regulated by an NPDES permit. Any person who discharges storm water associated with industrial activities must comply with the terms of the General Industrial Permit in order to lawfully discharge pollutants. (33 U.S.C. §§1311(a), 1342; 40 CFR §126(c)(1); General Industrial Permit Fact Sheet, p. vii ["All facility operators filing an NOI after the adoption of this General Permit must comply with this General Permit."]).

As enrollees under the General Industrial Permit, the Veridiam Facility Owners and/or Operators have failed and continue to fail to comply with the General Industrial Permit, as detailed below. Failure to comply with the General Industrial Permit is a Clean Water Act violation. (General Industrial Permit, §C.1).

### **A. The Veridiam Facility Discharges Contaminated Storm Water in Violation of the General Industrial Permit**

Discharge Prohibition A(2) of the General Industrial Permit prohibits storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance. Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. In addition, receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges, which cause or contribute to an exceedance of any water quality standards, such as the CTR or applicable Basin Plan water quality standards. "The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard." (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it 'causes or contributes to an exceedance of' such a standard, including the CTR." (*Id.* at 927).

If a discharger violates Water Quality Standards, the General Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards.(General Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(1)(C)). The Veridiam Facility Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Facility's SWPPP pursuant to section (C)(3).

As demonstrated by sample data submitted by the Veridiam Facility Owners and/or Operators, from at least January 27, 2010 through the present, the Facility Owners and/or



Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of the above listed prohibitions and limitations during every significant rain event. The Veridiam Facility's sampling data reflects 37 discharge violations. The Facility's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

This data further demonstrates the Veridiam Facility continuously discharges contaminated storm water during rain events which have not been sampled. (See Exhibit B, Rainfall data). Samples highlighted in peach below indicate exceedances of the applicable EPA Multi-Sector General Permit benchmarks as well.<sup>2</sup>

Annual Sampling Data Veridiam				Applicable CTR Limit (mg/L) (freshwater)	
Violation No.	Date/time of sample collection	Parameter	Result (mg/L)	Maximum Conc.	Continuous Conc.
1	10/5/2012	Zinc Total	2.44	.120	.120
2	10/5/2011	Zinc Total	2.09	.120	.120
3	10/5/2011	Zinc Total	0.918	.120	.120
4	4/11/2012	Zinc Total	0.651	.120	.120
5	12/13/2012	Zinc Total	0.644	.120	.120
6	2/7/2014	Zinc Total	0.62	.120	.120
7	12/13/2012	Zinc Total	0.6	.120	.120
8	4/11/2012	Zinc Total	0.467	.120	.120
9	10/5/2011	Zinc Total	0.293	.120	.120
10	2/7/2014	Zinc Total	0.2	.120	.120
11	4/11/2012	Zinc Total	0.166	.120	.120

In addition, the sampling data reveals numerous exceedances of San Diego Basin Plan Water Quality Objectives.

Annual Sampling Data				
Violation No.	Date/time of sample collection	Parameter	Result (mg/L)	Basin Plan WQO (mg/L)
1	10/5/2011	pH	6.38	Not < 6.5 or > 8.5
2	10/5/2011	pH	6.2	Not < 6.5 or > 8.5
3	2/7/2014	pH	6.14	Not < 6.5 or > 8.5
4	12/13/2012	pH	6.06	Not < 6.5 or > 8.5
5	10/5/2011	pH	5.99	Not < 6.5 or > 8.5

<sup>2</sup> 2008 Storm Water Multi-Sector General Permit for Industrial Activities, Sector AA, Table 8.AA-1





Every day the Veridiam Facility Owners and/or Operators discharged or continue to discharge polluted storm water in violation of the Discharge Prohibitions and Receiving Water Limitations of the General Industrial Permit is a separate and distinct violation of the Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The Veridiam Facility Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since January 27, 2010. These violations are ongoing and the Veridiam Facility Owners and/or Operators' violations will continue each day contaminated storm water is discharged in violation of the requirements of the General Industrial Permit. (See Exhibit B, Rainfall data). CERF will include additional violations when information becomes available.

**B. Failure to Develop and/or Implement BMPs that Achieve Compliance with Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology**

Effluent Limitation (B)(3) of the Storm Water Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges and authorized non-storm water discharges through implementation of the Best Available Technology Economically Achievable (BAT) for toxic pollutants<sup>3</sup> and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants.<sup>4</sup>

EPA Benchmarks are the pollutant concentrations which indicate whether a facility has successfully developed or implemented BMPs that meet the BAT/BCT. For fabricated metal products manufacturing facilities, Sector AA (SIC 3499), the EPA has instituted the following benchmarks.<sup>5</sup>

Parameter	Benchmark Monitoring Cutoff Concentration (mg/L)
Total Aluminum	.75
Total Iron	1.0
Total Zinc	.04-.26 (Hardness Dependent) .13 at 100-125 mg/L Water Hardness Range
Nitrate plus Nitrite Nitrogen	.68

Discharges with pollutant concentration levels above EPA Benchmarks and/or the CTR demonstrate that a facility has failed to develop and/or implement BMPs that achieve compliance with BAT for toxic pollutants and BCT for conventional pollutants. The Facility's annual reports demonstrate consistent exceedances of not only the CTR, but also EPA benchmarks.

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<sup>3</sup> Toxic pollutants are found at 40 CFR § 401.15 and include, but are not limited to: lead, nickel, zinc, silver, selenium, copper, and chromium.

<sup>4</sup> Conventional pollutants are listed at 40 CFR § 401.16 and include biological oxygen demand, total suspended solids, pH, fecal coliform, and oil and grease.

<sup>5</sup> 2008 Storm Water Multi-Sector General Permit for Industrial Activities, Sector AA, Table 8.AA-1



Annual Sampling Data				
Violation No.	Date/time of sample collection	Parameter	Result (mg/L)	EPA Benchmark (mg/L)
1	10/5/2011	Aluminum	1.03	.75
2	10/5/2011	Aluminum	.89	.75
3	10/5/2011	Nitrate plus Nitrite Nitrogen	3.34	.68
4	10/5/2011	Nitrate plus Nitrite Nitrogen	2.6	.68
5	10/5/2011	Nitrate plus Nitrite Nitrogen	1.78	.68
6	12/13/2012	Nitrate plus Nitrite Nitrogen	1.73	.68
7	2/7/2014	Nitrate plus Nitrite Nitrogen	1.26	.68
8	2/7/2014	Nitrate plus Nitrite Nitrogen	0.88	.68
9	4/11/2012	Nitrate plus Nitrite Nitrogen	0.83	.68
10	4/11/2012	Nitrate plus Nitrite Nitrogen	0.7	.68

Thus, the storm water discharge sampling data demonstrates that the Veridiam Facility Owners and/or Operators have not developed and/or implemented BMPs that meet the standards of BAT/BCT. (See *Baykeeper, supra*, 619 F.Supp. 2d at 925 ["Repeated and/or significant exceedances of the Benchmark limitations should be relevant" to the determination of meeting BAT/BCT]).

Sources of pollutants at the Veridiam Facility include but are not limited to: parts and tool cleaning, sand blasting, metal surface cleaning, manufacture of metal components, cleanup of spills and drips, surface treatment, galvanizing, heavy equipment use and storage, equipment and vehicle maintenance, removal of applied chemicals, and storage of uncoated steel.

Pollutants associated with the Facility include but are not limited to: total suspended solids, oil and grease, spent solvents, metals, paints, heavy metals, nitrates, gas and diesel fuel and fuel additives, and other pollutants.

Despite repeated violations of the aforementioned metrics, the Facility BMPs have not been updated to ensure protection of water quality. Thus, the Facility Owners and/or Operators are seriously in violation of Effluent Limitation (B)(3) of the Storm Water Permit. Every day the Veridiam Facility Owners and/or Operators operate with inadequately developed and/or implemented BMPs in violation of the BAT/BCT requirements in the General Industrial Permit is a separate and distinct violation of the Storm Water Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311 (a)). The Veridiam Owners and/or Operators have been in daily and continuous violation of the BAT/BCT requirements of the General Industrial Permit every day since at least January 27, 2010, and are subject to penalties for all violations since at least this date. These violations are ongoing and the Veridiam Facility Owners and/or Operators will continue to be in violation every day they fail to develop and/or implement BMPs that achieve BAT/BCT to prevent or reduce pollutants associated with industrial activity in storm water discharges at the Facility. Thus, the Veridiam Facility Owners and/or Operators are liable for civil penalties for 1,825 violations of the General Industrial Permit and the Clean Water Act.





**C. Failure to Develop and/or Implement an Adequate Storm Water Pollution Prevention Plan**

Section A(1) and Provision E(2) of the General Industrial Permit require dischargers to have developed and implemented a SWPPP by October 1, 1992, or prior to beginning industrial activities, that meets all of the requirements of the Storm Water Permit. The objective behind the SWPPP requirements is to identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm water discharges from the Veridiam Facility, and implement site-specific BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges. (General Industrial Permit, Section A(2)). To ensure its effectiveness, the SWPPP must be evaluated on an annual basis pursuant to the requirements of Section A(9), and must be revised as necessary to ensure compliance with the Permit. (General Industrial Permit, Section A(9), (10)).

City of El Cajon storm water consultant inspections of the Veridiam Facility, as well as sampling data from storm water discharges at the Facility, which are set forth in detail above, indicate that the Veridiam Facility Owners and/or Operators have not developed or implemented an adequate SWPPP that meets the requirements of Section A of the General Industrial Permit. Indeed, historical photographs and inspections show a variety of materials, including components and metal materials, stored without cover or containment. (See Exhibit C, [Inspection Reports Detailing Need for Corrective Action]).

For over five years the Veridiam Facility has been exceeding water quality standards: the Basin Plan objectives, the CTR, and EPA benchmarks. Nonetheless, the SWPPP has not been updated with new BMPs. The SWPPP also requires the aforementioned evaluations be submitted with the Annual Reports, but, on information available to CERF, such evaluations have not been submitted with the Annual Reports.

Every day the Veridiam Facility Owners and/or Operators operate the Facility without an adequate SWPPP and/or with an inadequately developed and/or implemented SWPPP is a separate and distinct violation of the General Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). The Veridiam Facility Owners and/or Operators have been in daily and continuous violation of the General Industrial Permit's SWPPP requirements every day since at least January 27, 2010. These violations are ongoing and the Veridiam Facility Owners and/or Operators will continue to be in violation every day they fail to revise, develop, and/or implement an adequate SWPPP for the Veridiam Facility.

The Veridiam Facility Owners and/or Operators are thus subject to penalties for all SWPPP-related violations of the General Industrial Permit and the Clean Water Act occurring since at least January 27, 2010. Thus, the Veridiam Facility Owners and/or Operators are liable for civil penalties for 1,825 violations of the General Industrial Permit and the Act.

**E. Failure to Monitor**

Sections B(5) and (7) of the General Industrial Permit require dischargers to visually observe and collect samples of storm water discharged from all locations where storm water is discharged. Facility operators, including the Veridiam Facility Owners and/or Operators, are required to collect samples from at least two qualifying storm events each wet season, including



one set of samples during the first storm event of the wet season. Required samples must be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility.

The Veridiam Facility Owners and/or Operators failed to sample two storm events as required for the 2009-2010, 2012-2013, and 2013-2014 wet seasons, despite the fact that there were numerous qualifying rain events during these wet seasons. (See Exhibit B). The Veridiam Facility Owners and/or Operators are thus subject to penalties for these monitoring violations in accordance with the General Industrial Permit – punishable by a minimum of \$37,500 per day of violation. (33 U.S.C. §1319(d); 40 CFR 19.4).

### **III. REMEDIES**

CERF's action will seek all remedies available under the Clean Water Act. (33 U.S.C. § 1365(a)(d)). "In suits under Section 505 of the Clean Water Act, citizens have access to the same remedies available to the EPA." (*Student Public Interest Research Group, Inc. v. Georgia-Pacific Corp.*, 615 F. Supp. 1419, 1425 (D.N.J. 1985), citing *Middlesex County Sewerage Auth. v. Nat'l Sea Clammers Ass'n*, 453 U.S. 1, 13-14 (1981)). Pursuant to Section 309(d) of the Clean Water Act and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4) each separate violation of the Clean Water Act subjects the violator to a penalty of up to \$37,500 per day for all violations occurring during the period commencing five years prior to the date upon which this notice is served.

In addition to civil penalties, CERF will seek injunctive relief preventing further violations of the Clean Water Act pursuant to sections 505(a) and (d), declaratory relief, and such other relief as permitted by law. Section 505(d) of the Clean Water Act permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF will seek to recover all of their costs and fees pursuant to section 505(d).

CERF has retained legal counsel to represent them in this matter. All communications should be addressed to:

**Marco A. Gonzalez**  
**COAST LAW GROUP LLP**  
**1140 S. Coast Highway 101**  
**Encinitas, CA 92024**  
**Tel: (760) 942-8505 x 102**  
**Fax: (760) 942-8515**  
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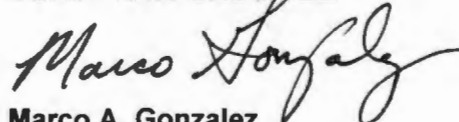




Upon expiration of the 60-day notice period, CERF will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced prior, continuing, and anticipated violations. During the 60-day notice period, however, CERF will entertain settlement discussions. If you wish to pursue such discussions in the absence of litigation, please contact Coast Law Group LLP immediately.

Sincerely,

COAST LAW GROUP LLP



Marco A. Gonzalez



Livia Borak

Attorneys for

Coastal Environmental Rights Foundation

CC:

Jared Blumenfeld, Region 9 Administrator Alexis Strauss, Deputy Regional Administrator U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA, 94105	Dave Gibson, Executive Officer Catherine Hagan, Staff Counsel San Diego Regional Water Quality Control Board 2375 Northside Drive, Suite 100 San Diego, CA 92108-2700
Gina McCarthy EPA Administrator Mail Code 4101M US EPA Ariel Rios Building (AR) 1200 Pennsylvania Avenue N.W. Washington, DC 20004	Thomas Howard Executive Director State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0110
Office of County Counsel County Administration Center 1600 Pacific Highway, Room 355 San Diego, CA 92101	

**Index of Attachments**

Exhibit A. Industrial Stormwater Fact Sheet, Sector AA  
Exhibit B. Rainfall Data  
Exhibit C. City of El Cajon (DMAX) Site Inspections



**EXHIBIT A**

# INDUSTRIAL STORMWATER

## FACT SHEET SERIES

### ***Sector AA: Fabricated Metal Products Manufacturing Facilities***



U.S. EPA Office of Water  
EPA-833-F-06-042  
December 2006

### ***What is the NPDES stormwater permitting program for industrial activity?***

Activities, such as material handling and storage, equipment maintenance and cleaning, industrial processing or other operations that occur at industrial facilities are often exposed to stormwater. The runoff from these areas may discharge pollutants directly into nearby waterbodies or indirectly via storm sewer systems, thereby degrading water quality.

In 1990, the U.S. Environmental Protection Agency (EPA) developed permitting regulations under the National Pollutant Discharge Elimination System (NPDES) to control stormwater discharges associated with eleven categories of industrial activity. As a result, NPDES permitting authorities, which may be either EPA or a state environmental agency, issue stormwater permits to control runoff from these industrial facilities.

### ***What types of industrial facilities are required to obtain permit coverage?***

This fact sheet specifically discusses stormwater discharges from the fabricated metal products manufacturing facilities as defined by Standard Industrial Classification (SIC) Major Groups 34 and 39. Facilities and products in this group fall under the following categories, all of which require coverage under an industrial stormwater permit:

- ◆ Fabricated metal products, except machinery and transportation equipment and cutting (SIC 3411-3499)
- ◆ Jewelry, silverware, and plated ware (SIC 3911-3915)
- ◆ Coating, engraving, and allied services (SIC 3479)

This fact sheet does not cover discharges from establishments not requiring permit coverage including those engaged in manufacturing and rolling of ferrous and nonferrous metals, forgings or stampings, electrolytic, or other processes for refining copper from ore.

### ***What does an industrial stormwater permit require?***

Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site. These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site. The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA's industrial stormwater permit and links to State stormwater permits, go to [www.epa.gov/npdes/stormwater](http://www.epa.gov/npdes/stormwater) and click on "Industrial Activity."



**What pollutants are associated with my facility's activities?**

Pollutants conveyed in stormwater discharges from facilities involved with the manufacturing of fabricated metal products will vary. There are a number of factors that influence to what extent industrial activities and significant materials can affect water quality.

- ◆ Geographic location
- ◆ Topography
- ◆ Hydrogeology
- ◆ Extent of impervious surfaces (e.g., concrete or asphalt)
- ◆ Type of ground cover (e.g., vegetation, crushed stone, or dirt)
- ◆ Outdoor activities (e.g., material storage, loading/unloading, vehicle maintenance)
- ◆ Size of the operation
- ◆ Type, duration, and intensity of precipitation events

The activities, pollutant sources, and pollutants detailed in Table 1 are commonly found at fabricated metal products manufacturing facilities.

**Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Fabricated Metal Products Manufacturing Facilities**

Activity	Pollutant Source	Pollutant
Tool workpiece interface/shaving, chipping	Used metal working fluid with fine metal dust	Total suspended solids (TSS), chemical oxygen demand (COD), oil and grease
Parts/tools cleaning, sand blasting, metal surface cleaning, removal of applied chemicals	Solvent cleaners, abrasive cleaners, alkaline cleaners, acid cleaners, rinse waters	Spent solvents, TSS, acid/alkaline waste, oil
	Solvents, cold and hot dips, cleaning parts, degreasing	Acid, coolants, clean composition, degreaser, mineral spirits, pickle liquor, spent caustic, sludge.
Making structural components	Cuttings, scraps, turnings, fines	Metals
Painting operations	Paint and paint thinner spills, sanding, spray painting	Paints, spent solvents, heavy metals, TSS
	Empty containers, paint application wastes, spills, over spraying, storage areas	Paint wastes, thinner, varnish, heavy metals, spent chlorinated solvents
Cleanup of spills and drips	Used absorbent materials	TSS, spilled material
Transportation or storage of materials	Wood dunnage/pallets	BOD, TSS
Metal preparation	Grinding, welding, sawing, shaving, brazing, beriding, cutting, etching	Steel scraps, aluminum scraps, brass, copper, dust, chips and borings, steel scale, teflon, manganese.
Surface treatment	Finishing, plating, case hardening, chemical coating, coating, polishing, rinsing, abrasive cleaning, electroplating	Acid, aromatic solvent, corn cob, lubricants, sand, oil, pH, nitrates, nitrites, carbon, phosphates, borates, nitrogen, oily sludge, nickel, chromium, hydrofluoric acid.
Galvanizing	Spills, leaks, transporting materials	Acid solution, phosphates, zinc chromate, hexavalent chromium, nickel.
Heavy equipment use and storage	Leaking fluids, fluids replacement, washing equipment, use on poor surface area, soil disturbance	Oil, heavy metals, organics, fuels, TSS, hydraulic oil, diesel fuel, gasoline
Equipment/vehicle maintenance	Leaking fluids, fluids replacement, washing equipment	Oil, grease
	Vehicle fueling	Gas/diesel fuel, fuel additives

## INDUSTRIAL STORMWATER FACT SHEET SERIES

### Sector AA: Fabricated Metal Products Manufacturing Facilities

**Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Fabricated Metal Products Manufacturing Facilities (continued)**

Activity	Pollutant Source	Pollutant
Storage of uncoated structural steel	Stored on porous pavement	Aluminum, lead, zinc, copper, iron, oxide, oil, nickel, manganese.
Storing galvanized steel directly on the ground	Galvanizing material drippage or leaching	Metals: zinc, nickel, cadmium, chromium.
Vehicle/equipment traffic	Soil disturbance and erosion	TSS from erosion, hydraulic fluid loss/spillage
Cleaning equipment/vehicles	Chemicals disposed improperly, spillage	Oil, grease, surfactants, chromates, acid, hydroxide, nitric acid

### ***What BMPs can be used to minimize contact between stormwater and potential pollutants at my facility?***

A variety of BMP options may be applicable to eliminate or minimize the presence of pollutants in stormwater discharges from fabricated metal products manufacturing facilities. You will likely need to implement a combination or suite of BMPs to address stormwater runoff at your facility. Your first consideration should be for pollution prevention BMPs, which are designed to prevent or minimize pollutants from entering stormwater runoff and/or reduce the volume of stormwater requiring management. Prevention BMPs can include regular cleanup, collection and containment of debris in storage areas, and other housekeeping practices, spill control, and employee training. It may also be necessary to implement treatment BMPs, which are engineered structures, intended to treat stormwater runoff and/or mitigate the effects of increased stormwater runoff peak rate, volume, and velocity. Treatment BMPs are generally more expensive to install and maintain and include oil-water separators, wet ponds, and proprietary filter devices.

Measures to control pollutants at metal fabricating operations should focus primarily on the storage of waste and raw materials, chemical storage areas, and equipment storage and service areas. Since most of the operations occur indoors, procedures are often only needed to minimize exposure of pollutants to stormwater runoff in association with the handling and transporting of materials. Of primary importance is the control of activities and use of chemicals that have been identified as potential sources of pollutants.

The most effective discharge controls for these facilities are BMPs targeted toward source control. This includes utilizing inside storage as much as possible and implementing programs for recycling scrap materials. Many of these practices require the use of covers, indoor storage, and indoor operations. Some structural measures would provide an additional control to reduce the potential for exposure at these facilities. These include source reduction diversion dikes, grass swales, vegetative covers, and sedimentation ponds. Preventive controls are typically low in cost and relatively easy to implement, as the majority of the facilities in this industry already employ these practices. In addition, directing flows to privately owned treatment works or retention ponds will be the most effective measure.

The industry also must give consideration to the non-stormwater discharges associated with improper disposal of materials from the indoor processes due to the extensive use of chemicals in the preparation and finishing phases of metal preparation and fabrication. The industry also involves grinding, welding, and sanding operations that will require special consideration to control potential pollutants that could accumulate and be subject to stormwater runoff.

Most of the measures commonly implemented to reduce pollutants in stormwater associated with the fabricated metals industry are generally uncomplicated practices. Some of the practices may be predicated on the size of the operation, the types of processes that are exercised from a full-scale plant operation to a more specialized company that conducts only a portion of the operations usually found in the fabricating industry.

## INDUSTRIAL STORMWATER FACT SHEET SERIES

### ***Sector AA: Fabricated Metal Products Manufacturing Facilities***

All fabricated metal products facilities should implement BMPs in the following areas of the site:

- ◆ Metal fabricating areas
- ◆ Storage areas for raw metal
- ◆ Receiving, unloading, and loading areas
- ◆ Heavy equipment storage
- ◆ Metal working fluid areas
- ◆ Unprotected liquid storage tanks
- ◆ Chemical cleaners and rinse water
- ◆ Raw steel collection areas
- ◆ Paints and painting equipment
- ◆ Vehicle and equipment maintenance areas
- ◆ Hazardous waste storage areas
- ◆ Transporting chemicals to storage areas
- ◆ Finished products (galvanized)
- ◆ Wooden pallets and empty drums

BMPs must be selected and implemented to address the following:

#### **Good Housekeeping Practices**

Good housekeeping is a practical, cost-effective way to maintain a clean and orderly facility to prevent potential pollution sources from coming into contact with stormwater. It includes establishing protocols to reduce the possibility of mishandling materials or equipment and training employees in good housekeeping techniques. Common areas where good housekeeping practices should be followed include trash containers and adjacent areas, material storage areas, vehicle and equipment maintenance areas, and loading docks. Good housekeeping practices must include a schedule for regular pickup and disposal of garbage and waste materials and routine inspections of drums, tanks, and containers for leaks and structural conditions. Practices also include containing and covering garbage, waste materials, and debris. Involving employees in routine monitoring of housekeeping practices has proven to be an effective means of ensuring the continued implementation of these measures.

#### **Minimizing Exposure**

Where feasible, minimizing exposure of potential pollutant sources to precipitation is an important control option. Minimizing exposure prevents pollutants, including debris, from coming into contact with precipitation and can reduce the need for BMPs to treat contaminated stormwater runoff. It can also prevent debris from being picked up by stormwater and carried into drains and surface waters. Examples of BMPs for exposure minimization include covering materials or activities with temporary structures (e.g., tarps) when wet weather is expected or moving materials or activities to existing or new permanent structures (e.g., buildings, silos, sheds). Even the simple practice of keeping a dumpster lid closed can be a very effective pollution prevention measure.

#### **Erosion and Sediment Control**

BMPs must be selected and implemented to limit erosion on areas of your site that, due to topography, activities, soils, cover, materials, or other factors are likely to experience erosion. Erosion control BMPs such as seeding, mulching, and sodding prevent soil from becoming dislodged and should be considered first. Sediment control BMPs such as silt fences, sediment ponds, and stabilized entrances trap sediment after it has eroded. Sediment control BMPs should be used to back-up erosion control BMPs.



## Management of Runoff

Your SWPPP must contain a narrative evaluation of the appropriateness of stormwater management practices that divert, infiltrate, reuse, or otherwise manage stormwater runoff so as to reduce the discharge of pollutants. Appropriate measures are highly site-specific, but may include, among others, vegetative swales, collection and reuse of stormwater, inlet controls, snow management, infiltration devices, and wet retention measures.

A combination of preventive and treatment BMPs will yield the most effective stormwater management for minimizing the offsite discharge of pollutants via stormwater runoff. Though not specifically outlined in this fact sheet, BMPs must also address preventive maintenance records or logbooks, regular facility inspections, spill prevention and response, and employee training.

All BMPs require regular maintenance to function as intended. Some management measures have simple maintenance requirements, others are quite involved. You must regularly inspect all BMPs to ensure they are operating properly, including during runoff events. As soon as a problem is found, action to resolve it should be initiated immediately.

Implement BMPs, such as those listed below in Table 2 for the control of pollutants at fabricated metal product manufacturing facilities, to minimize and prevent the discharge of pollutants in stormwater. Identifying weaknesses in current facility practices will aid the permittee in determining appropriate BMPs that will achieve a reduction in pollutant loadings. BMPs listed in Table 2 are broadly applicable to fabricated metal product manufacturing facilities; however, this is not a complete list and you are recommended to consult with regulatory agencies or a stormwater engineer/consultant to identify appropriate BMPs for your facility.

**Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities**

Pollutant Source	BMPs
Metal fabricating areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Sweep fabrication areas frequently to avoid heavy accumulation of steel ingots, fines, and scrap.</li> <li><input type="checkbox"/> Absorb dust through a vacuum system to avoid accumulation on roof tops and onto the ground.</li> <li><input type="checkbox"/> Sweep all accessible paved areas on a regular basis.</li> <li><input type="checkbox"/> Maintain floors in a clean and dry condition using dry cleanup techniques.</li> <li><input type="checkbox"/> Remove waste and dispose of regularly.</li> <li><input type="checkbox"/> Train employees on good housekeeping measures.</li> </ul>
Raw material storage areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Store materials in a covered area whenever possible.</li> <li><input type="checkbox"/> Organize storage areas so there is easy access in case of a spill.</li> <li><input type="checkbox"/> Label stored materials to aid in identifying spill contents.</li> <li><input type="checkbox"/> Minimize the amount of material stored to avoid corrosive activity from long-term exposed materials.</li> <li><input type="checkbox"/> Dike or berm the area to prevent or minimize run-on.</li> <li><input type="checkbox"/> Keep area neat and orderly; stack neatly on pallets or off the ground.</li> <li><input type="checkbox"/> Cover exposed materials.</li> </ul>
Receiving, unloading, and loading areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Confine loading/unloading activities to designated areas outside drainage pathways and away from surface waters.</li> <li><input type="checkbox"/> Close storm drains during loading/unloading activities in surrounding areas.</li> </ul>



# INDUSTRIAL STORMWATER FACT SHEET SERIES

## Sector AA: Fabricated Metal Products Manufacturing Facilities

**Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)**

Pollutant Source	BMPs
Receiving, unloading, and loading areas (continued)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Use a dead-end sump where materials could be directed.</li> <li><input type="checkbox"/> Inspect containers for leaks or damage prior to loading/unloading.</li> <li><input type="checkbox"/> Avoid loading/unloading materials in the rain or provide cover or other protection for loading docks.</li> <li><input type="checkbox"/> Provide diversion berms, dikes or grassed swales around the perimeter of the area to limit run-on.</li> <li><input type="checkbox"/> Cover loading and unloading areas and perform these activities on an impervious pad to enable easy collection of spilled materials.</li> <li><input type="checkbox"/> Slope the impervious concrete floor or pad to collect spills and leaks and convey them to proper containment and treatment.</li> <li><input type="checkbox"/> Provide overhangs or door skirts to enclose trailer ends at truck loading/unloading docks</li> <li><input type="checkbox"/> For rail transfer, a drip pan shall be installed within the rails to collect spillage from the tank.</li> <li><input type="checkbox"/> Where liquid or powdered materials are transferred in bulk to/from truck or rail cars, ensure hose connection points at storage containers are inside containment areas, or drip pans are used in areas where spillage may occur which are not in a containment area.</li> <li><input type="checkbox"/> Enclose material handling systems.</li> <li><input type="checkbox"/> Cover materials entering and leaving areas.</li> <li><input type="checkbox"/> Use dry cleanup methods instead of washing the areas down.</li> <li><input type="checkbox"/> Regularly sweep area to minimize debris on the ground.</li> <li><input type="checkbox"/> Provide dust control if necessary. When controlling dust, sweep and/or apply water or materials that will not impact surface or ground water.</li> <li><input type="checkbox"/> Develop and implement spill prevention, containment, and countermeasure (SPCC) plans.</li> <li><input type="checkbox"/> Train employees in spill prevention, control, cleanup, and proper materials management techniques.</li> </ul>
Heavy equipment storage areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Vehicles should be stored indoors when possible.</li> <li><input type="checkbox"/> If stored outdoors, use gravel, concrete, or other porous surfaces to minimize or prevent heavy equipment from creating ditches or other conveyances that would cause sedimentation runoff and increase TSS loadings.</li> <li><input type="checkbox"/> Provide covering for outdoor storage areas.</li> <li><input type="checkbox"/> Divert drainage to the grass swales, filter strips, retention ponds, or holding tanks.</li> <li><input type="checkbox"/> Direct drainage systems away from high traffic areas into collection systems.</li> <li><input type="checkbox"/> Clean equipment prior to storage.</li> </ul>
Metal working fluid areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Store used metal working fluid with fine metal dust indoors.</li> <li><input type="checkbox"/> Use tight sealing lids on all fluid containers.</li> <li><input type="checkbox"/> Use straw, clay absorbents, sawdust, or synthetic absorbents to confine or contain any spills.</li> <li><input type="checkbox"/> Establish recycling programs for used fluids when possible.</li> <li><input type="checkbox"/> Conduct daily inspections of each machine to identify problems and trends and reduce fluid waste.</li> </ul>

# INDUSTRIAL STORMWATER FACT SHEET SERIES

## Sector AA: Fabricated Metal Products Manufacturing Facilities

**Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)**

Pollutant Source	BMPs
Metal working fluid areas (continued)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Use pumps, spigots, and funnels when transferring metal working fluid to reduce the amount of lost fluid and the risk of spilling fluids.</li> <li><input type="checkbox"/> Fix leaking seals and gadgets to prevent leaks.</li> </ul>
Unprotected liquid storage tanks	<ul style="list-style-type: none"> <li><input type="checkbox"/> If area is uncovered, connect sump outlet to sanitary sewer (if possible) or an oil/water separator, catch basin filter, etc. If connecting to a sanitary sewer check with the system operator to ensure that the discharge is acceptable. If implementing separator or filter technologies ensure that regular inspections and maintenance procedures are in place.</li> <li><input type="checkbox"/> Develop and implement spill plans.</li> <li><input type="checkbox"/> Train employees in spill prevention and control.</li> </ul> <p>Above ground tanks</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide secondary containment, such as dikes, with a height sufficient to contain a spill (the greater of 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank).</li> <li><input type="checkbox"/> If containment structures have drains, ensure that the drains have valves, and that valves are maintained in the closed position. Institute protocols for checking/testing stormwater in containment areas prior to discharge.</li> <li><input type="checkbox"/> Use double-walled tanks.</li> <li><input type="checkbox"/> Keep liquid transfer nozzles/hoses in secondary containment area.</li> <li><input type="checkbox"/> Include overflow protection.</li> </ul> <p>Portable containers/drums</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Store drums indoors when possible.</li> <li><input type="checkbox"/> Store drums, including empty or used drums, in secondary containment with a roof or cover (including temporary cover such as a tarp that prevents contact with precipitation).</li> <li><input type="checkbox"/> Provide secondary containment, such as dikes or portable containers, with a height sufficient to contain a spill (the greater of 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank).</li> <li><input type="checkbox"/> Clearly label drum with its contents.</li> </ul>
Chemical cleaners and rinse water	<ul style="list-style-type: none"> <li><input type="checkbox"/> Use drip pans and other spill devices to collect spills or solvents and other liquid cleaners.</li> <li><input type="checkbox"/> Recycle wastewater.</li> <li><input type="checkbox"/> Store recyclable waste indoors or in covered containers.</li> <li><input type="checkbox"/> Substitute nontoxic cleaning agents when possible.</li> </ul>
Raw steel collection areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Keep collection areas clean.</li> <li><input type="checkbox"/> Keep materials in a covered storage bin or inside until pickup.</li> <li><input type="checkbox"/> Collect scrap metals, fines, iron dust and store under cover and recycle.</li> </ul>
Paints and painting equipment	<ul style="list-style-type: none"> <li><input type="checkbox"/> Paint and sand indoors when possible.</li> <li><input type="checkbox"/> If done outside, enclose sanding and painting areas with tarps or plastic sheeting.</li> <li><input type="checkbox"/> Avoid painting and sandblasting operations outdoors in windy weather conditions.</li> <li><input type="checkbox"/> Use tarps, drip pans, or other spill collection devices to contain and collect spills.</li> <li><input type="checkbox"/> Use effective spray equipment that delivers more paint to the target and less overspray.</li> <li><input type="checkbox"/> Mix paints and solvents in designated areas away from drains, ditches, piers, and surface waters, preferably indoors or under cover.</li> </ul>

# INDUSTRIAL STORMWATER FACT SHEET SERIES

## Sector AA: Fabricated Metal Products Manufacturing Facilities

**Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)**

Pollutant Source	BMPs
Paints and painting equipment (continued)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Have absorbent and other cleanup items readily available for immediate cleanup of spills.</li> <li><input type="checkbox"/> Allow empty paint cans to dry before disposal.</li> <li><input type="checkbox"/> Keep paint and paint thinner away from traffic areas to avoid spills.</li> <li><input type="checkbox"/> Recycle paint, paint thinner, and solvents.</li> <li><input type="checkbox"/> Establish and implement effective inventory control to reduce paint waste, including tracking date received and expiration dates.</li> <li><input type="checkbox"/> Use water-based paints when possible.</li> <li><input type="checkbox"/> Train employees to use the spray equipment properly.</li> </ul>
Metal chip storage areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Store waste chips indoors, if possible.</li> <li><input type="checkbox"/> Cover outdoors chip storage containers.</li> <li><input type="checkbox"/> Place chip storage containers on asphalt or concrete surfaces.</li> <li><input type="checkbox"/> Be sure fluid has completely drained before placing chips in storage containers.</li> <li><input type="checkbox"/> Continue draining fluids, if necessary. This can be done as simply as tilting containers towards one end and allowing excess fluids to drain through a hole into a residue container.</li> <li><input type="checkbox"/> Inspect area for leaks or spills.</li> <li><input type="checkbox"/> Monitor and maintain containers on a regular basis. Empty storage or residue containers and do not allow them to overflow.</li> </ul>
Hazardous waste storage areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Cover and/or enclose storage areas (including temporary cover such as a tarp that prevents contact with precipitation).</li> <li><input type="checkbox"/> All hazardous waste must be stored in sealed drums.</li> <li><input type="checkbox"/> Establish centralized satellite drum-storage areas.</li> <li><input type="checkbox"/> Provide secondary containment around chemical storage areas.</li> <li><input type="checkbox"/> If containment structures have drains, ensure that the drains have valves, and that valves are maintained in the closed position. Institute protocols for checking/testing stormwater in containment areas prior to discharge.</li> <li><input type="checkbox"/> Check for corrosion and leakage of storage containers.</li> <li><input type="checkbox"/> Label materials clearly.</li> <li><input type="checkbox"/> Properly dispose of outdated materials.</li> <li><input type="checkbox"/> Dike or use grass swales, ditches, or other containment to prevent run-on or runoff in case of spills.</li> <li><input type="checkbox"/> Post notices prohibiting dumping of materials into storm drains.</li> <li><input type="checkbox"/> Store containers, drums, and bags away from high traffic routes and surface waters.</li> <li><input type="checkbox"/> Do not stack containers in such a way as to cause leaks or damage to the containers.</li> <li><input type="checkbox"/> Use pallets to store containers when possible.</li> <li><input type="checkbox"/> Store materials with adequate space for traffic without disturbing drums.</li> <li><input type="checkbox"/> Maintain low inventory level of chemicals based on need.</li> <li><input type="checkbox"/> Train employees in spill prevention and control and proper hazardous waste management</li> </ul>



# INDUSTRIAL STORMWATER FACT SHEET SERIES

## Sector AA: Fabricated Metal Products Manufacturing Facilities

**Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)**

Pollutant Source	BMPs
Equipment/vehicle maintenance areas	<p>Good Housekeeping</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Eliminate floor drains that are connected to the storm or sanitary sewer; if necessary, install a sump that is pumped regularly.</li> <li><input type="checkbox"/> Prevent spills and drips.</li> <li><input type="checkbox"/> Use drip plans, drain boards, and drying racks to direct drips back into a sink or fluid holding tank for reuse.</li> <li><input type="checkbox"/> Drain all parts of fluids prior to disposal. Oil filters can be crushed and recycled.</li> <li><input type="checkbox"/> Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.</li> <li><input type="checkbox"/> Dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers properly.</li> <li><input type="checkbox"/> Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).</li> <li><input type="checkbox"/> Maintain an organized inventory of materials.</li> <li><input type="checkbox"/> Eliminate or reduce the number or amount of hazardous materials and waste by substituting nonhazardous or less hazardous materials.</li> <li><input type="checkbox"/> Clean up leaks, drips, and other spills without using large amounts of water.</li> <li><input type="checkbox"/> Prohibit the practice of hosing down an area where the practice would result in the exposure of pollutants to stormwater.</li> <li><input type="checkbox"/> Clean without using liquid cleaners whenever possible.</li> <li><input type="checkbox"/> Perform all cleaning at a centralized station so the solvents stay in one area.</li> <li><input type="checkbox"/> If parts are dipped in liquid, remove them slowly to avoid spills.</li> <li><input type="checkbox"/> Do not pour liquid waste down floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections.</li> </ul> <p>Minimizing Exposure</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Perform all cleaning operations indoors or under covering when possible. Conduct the cleaning operations in an area with a concrete floor with no floor drainage other than to sanitary sewers or treatment facilities.</li> <li><input type="checkbox"/> If operations are uncovered, perform them on concrete pad that is impervious and contained.</li> <li><input type="checkbox"/> Park vehicles and equipment indoors or under a roof whenever possible and maintain proper control of oil leaks/spills</li> <li><input type="checkbox"/> Inspect vehicles closely for leaks and use pans to collect fluid when leaks occur.</li> </ul> <p>Management of Runoff</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Use berms, curbs, grassed swales or similar means to ensure that stormwater runoff from other parts of the facility does not flow over the maintenance area.</li> <li><input type="checkbox"/> Collect the stormwater runoff from the cleaning area and providing treatment or recycling. Discharge vehicle wash or rinse water to the sanitary sewer (if allowed by sewer authority), wastewater treatment, a land application site, or recycled on-site. DO NOT discharge washwater to a storm drain or to surface water.</li> </ul> <p>Inspections and Training</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Inspect the maintenance area regularly to insure BMPs are implemented.</li> <li><input type="checkbox"/> Train employees on proper waste control and disposal procedures.</li> </ul>



# INDUSTRIAL STORMWATER FACT SHEET SERIES

## Sector AA: Fabricated Metal Products Manufacturing Facilities

**Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)**

Pollutant Source	BMPs
Vehicle fueling	<ul style="list-style-type: none"> <li><input type="checkbox"/> Conduct fueling operations (including the transfer of fuel from tank trucks) on an impervious or contained pad or under a roof or canopy where possible. Covering should extend beyond spill containment pad to prevent rain from entering.</li> <li><input type="checkbox"/> When fueling in uncovered area, use a concrete pad (not asphalt - not chemically resistant to the fuels being handled).</li> <li><input type="checkbox"/> Use drip pans where leaks or spills of fuel can occur and where making and breaking hose connections.</li> <li><input type="checkbox"/> Use fueling hoses with check valves to prevent hose drainage after filling.</li> <li><input type="checkbox"/> Use spill and overflow protection devices.</li> <li><input type="checkbox"/> Cleanup spills and leaks immediately.</li> <li><input type="checkbox"/> Minimize/eliminate run-on onto fueling areas.</li> <li><input type="checkbox"/> Collect stormwater runoff and provide treatment or recycling.</li> <li><input type="checkbox"/> Use dry cleanup methods for fuel area rather than hosing the fuel area down. Sweep up absorbents as soon as spilled substances have been absorbed.</li> <li><input type="checkbox"/> Regularly inspect and perform preventive maintenance on storage tanks to detect potential leaks before they occur.</li> <li><input type="checkbox"/> Inspect the fueling area for leaks and spills.</li> <li><input type="checkbox"/> Provide curbing or posts around fuel pumps to prevent collisions from vehicles.</li> <li><input type="checkbox"/> Discourage "topping off" of fuel tanks.</li> <li><input type="checkbox"/> Train personnel on vehicle fueling BMPs.</li> </ul>
Vehicle and equipment cleaning	<ul style="list-style-type: none"> <li><input type="checkbox"/> Designate vehicle and equipment wash areas that drain to recycle ponds or process wastewater treatment systems.</li> <li><input type="checkbox"/> Conduct vehicle washing operation indoors or in a covered area.</li> <li><input type="checkbox"/> Clean washwater residue from portions of the site that drain to stormwater discharges.</li> <li><input type="checkbox"/> Train employees on proper procedure for washing vehicles and equipment including a discussion of the appropriate location for vehicle washing.</li> </ul>
Transporting chemicals to storage areas	<ul style="list-style-type: none"> <li><input type="checkbox"/> Store drums as close to operational building as possible.</li> <li><input type="checkbox"/> Label all drums with proper warning and handling instructions.</li> <li><input type="checkbox"/> Forklift operators should be trained to avoid puncturing drums.</li> </ul>
Finished products (galvanized) storage	<ul style="list-style-type: none"> <li><input type="checkbox"/> Store finished products indoors, on a wooden pallets concrete pad, gravel surface, or other impervious surface.</li> </ul>
Wooden pallets and empty drums	<ul style="list-style-type: none"> <li><input type="checkbox"/> Clean contaminated wooden pallets.</li> <li><input type="checkbox"/> Cover empty drums.</li> <li><input type="checkbox"/> Cover contaminated wooden pallets.</li> <li><input type="checkbox"/> Store drums and pallets indoors.</li> <li><input type="checkbox"/> Clean empty drums.</li> <li><input type="checkbox"/> Store pallets and drums on concrete pads.</li> </ul>

### ***What if activities and materials at my facility are not exposed to precipitation?***

The industrial stormwater program requires permit coverage for a number of specified types of industrial activities. However, when a facility is able to prevent the exposure of ALL relevant activities and materials to precipitation, it may be eligible to claim no exposure and qualify for a waiver from permit coverage.

If you are regulated under the industrial permitting program, you must either obtain permit coverage or submit a no exposure certification form, if available. Check with your permitting authority for additional information as not every permitting authority program provides no exposure exemptions.

### ***Where do I get more information?***

For additional information on the industrial stormwater program see [www.epa.gov/npdes/stormwater/msgp](http://www.epa.gov/npdes/stormwater/msgp).

A list of names and telephone numbers for each EPA Region or state NPDES permitting authority can be found at [www.epa.gov/npdes/stormwatercontacts](http://www.epa.gov/npdes/stormwatercontacts).

### ***References***

Information contained in this Fact Sheet was compiled from EPA's past and present Multi-Sector General Permits and from the following sources:

- ◆ City of Phoenix, Arizona, Street Transportation Department. 2004. Prevent Storm Water Contamination: Best Management Practices for Section AC - Electronic & Electrical equipment or components, Photographic & Optical Goods Manufacturers.  
<http://phoenix.gov/STREETS/eleltrnic.pdf>
- ◆ U.S. EPA, Office of Science and Technology. 1999. Preliminary Data Summary of Urban Stormwater Best Management Practices. EPA-821-R-99-012  
[www.epa.gov/OST/stormwater](http://www.epa.gov/OST/stormwater)
- ◆ U.S. EPA, Office of Wastewater Management. *NPDES Stormwater Multi-Sector General Permit for Industrial Activities (MSGP)*.  
[www.epa.gov/npdes/stormwater/msgp](http://www.epa.gov/npdes/stormwater/msgp)
- ◆ Washington State Department of Ecology. 1999. Metal Machining Sector: A Pollution Prevention Assessment and Guidance. Publication #99-412.  
[www.ecy.wa.gov/pubs/99412.pdf](http://www.ecy.wa.gov/pubs/99412.pdf)

**EXHIBIT B**

# Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours

## NOAA National Climactic Data Center

Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

Data Types: HPCP - Precipitation (100th of an inch)

2009

Month	Inches	Time:
6-Feb	0.61	
7-Feb	0.74	
8-Feb	0.2	
9-Feb	0.21	8:00 AM
10-Feb	0.34	
14-Feb	0.13	
16-Feb	0.62	12:00 PM
22-Mar	0.22	11:00 AM
31-May	0.13	
4-Jun	0.13	
29-Nov	0.35	
7-Dec	0.13	9:00 AM
8-Dec	1.99	
12-Dec	0.13	
13-Dec	0.88	
<b>TOTAL</b>	<b>6.81</b>	

2010

Month	Inches	Time:
18-Jan	0.1	4:00 PM
19-Jan	1.4	1:00 PM
20-Jan	7.4	
21-Jan	1.65	12:00 PM
22-Jan	1.41	
23-Jan	0.29	
27-Jan	0.14	
6-Feb	0.17	11:00 AM
7-Feb	0.27	
10-Feb	0.47	
20-Feb	0.49	
22-Feb	0.12	
27-Feb	0.2	
28-Feb	1.27	
7-Mar	0.38	10:00 AM
8-Mar	0.3	
1-Apr	0.49	
6-Apr	0.15	
12-Apr	0.65	4:30 PM
22-Apr	0.47	
6-Oct	0.43	
20-Oct	0.9	12:00 PM
21-Oct	0.12	
30-Oct	0.38	8:00 AM
20-Nov	0.69	2:00 PM
21-Nov	0.12	11:00 AM
24-Nov	0.87	
20-Dec	0.83	
21-Dec	3.46	8:00 AM
22-Dec	0.48	8:00 AM
26-Dec	0.69	
30-Dec	1.8	9:00 AM
<b>TOTAL</b>	<b>28.59</b>	



# Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours

## NOAA National Climactic Data Center

Stations: COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

Data Types: HPCP - Precipitation (100th of an inch)

2011

Month	Inches	Time:
3-Jan	0.85	
4-Jan	0.1	
18-Feb	0.24	5:00 AM
20-Feb	0.2	
26-Feb	0.8	
27-Feb	0.22	
7-Mar	0.2	
21-Mar	0.89	
22-Mar	0.14	
24-Mar	0.25	
26-Mar	0.15	
9-Apr	0.14	
18-May	0.73	
29-May	0.1	
4-Nov	0.34	4:00 PM
12-Nov	1.04	1:00 PM
12-Dec	0.96	9:00 AM
<b>TOTAL</b>	<b>7.35</b>	

2012

Month	Inches	Time:
23-Jan	0.2	2:00 PM
24-Jan	0.28	
7-Feb	0.23	4:00 PM
14-Feb	0.34	
16-Feb	0.2	
28-Feb	0.72	
17-Mar	0.24	1:00 PM
18-Mar	0.47	
25-Mar	0.43	5:00 PM
1-Apr	0.11	
11-Apr	0.45	
13-Apr	0.33	4:00 PM
26-Apr	0.61	
12-Oct	0.77	
8-Nov	0.14	
1-Dec	0.23	
13-Dec	1.6	8:00 AM
14-Dec	0.28	
15-Dec	0.37	
19-Dec	0.47	
25-Dec	0.37	
30-Dec	0.28	
<b>TOTAL</b>	<b>9.12</b>	

# **Qualifying Rainfall Events (.1 inches of rain or more) During Business Hours**

## **NOAA National Climactic Data Center**

**Stations:** COOP:047740 - SAN DIEGO LINDBERGH FIELD, CA US

**Data Types:** HPCP - Precipitation (100th of an inch)

**2013**

<u>Month</u>	<u>Inches</u>
7-Jan	0.26
25-Jan	0.23
26-Jan	0.73
27-Jan	0.1
9-Feb	0.15
20-Feb	0.3
9-Mar	0.2
21-Nov	0.28
22-Nov	0.2
8-Dec	0.17
20-Dec	0.1
<b>TOTAL</b>	<b>2.72</b>

**2014**

<u>Month</u>	<u>Inches</u>
3-Feb	0.25
7-Feb	0.37
27-Feb	0.1
28-Feb	0.46
1-Mar	0.76
2-Mar	0.6
2-Apr	0.22
26-Apr	0.13
<b>TOTAL</b>	<b>2.89</b>

## EXHIBIT C



# City of El Cajon

## STORM WATER COMPLIANCE INSPECTION FOR INDUSTRIAL AND COMMERCIAL FACILITIES

3-17-11  
10 AM  
1.5 Hrs.

Inspector Name: Anjuli Corcovelos

Date: 6/2/2010

Time: 14:20

FID#: 12

Type of Inspection:

Result:

☒ Routine ☐ Follow-Up

☒ Full Inspection ☐ Follow-Up (i.e. not full) ☐ Could Not Contact ☐ Not Inventoried ☐ Refused

☐ Complaint Investigation

☐ Moved, Vacant ☐ Moved, Replaced ☐ Duplicate

☐ Out of Jurisdiction

### A. Contact Information

#### Original

#### Changes

Business Name: Veridiam

Business Name:

Street Address: 1717 N Cuyamaca St

Street Address:

Unit #:

Unit #:

Zip Code: 92020

Zip Code:

Phone Number: 619 596 4300

☐ Home Based? ☐ Mobile Business?

Fax Number: 619 562 1190

☐ Multiple businesses / units located at address?

Responsible Person: Duane Hollander

Person Present: Duane Hollander

Title:

E-Mail:

Mgt Co: none

Prop Mgt Phone: none

Landscape Co: none

Landscape Phone: none

Latitude: 32.81841312

Longitude: -116.97899479

Business Certificate Number: 0084147 Expiration: 12/31/2010 ☐ Unable to Verify

### B. Facility / Site Information

Principal Activity: Manufacture steel pipes/tubes

Currently Assigned SIC Code(s): 3317

Do the existing SIC Code(s) best represent the principal activity? ☒ Yes ☐ No

Recommended SIC Code(s):

Is the facility subject to CA Statewide General Industrial Permit? ☒ Mandatory ☐ Conditional ☐ No

If the facility is subject to the CA Statewide General Industrial Permit, has the facility filed...

☐ NONA/NEC ☒ NOI WDID #: 9371020299 ☐ NOT Approval Date:

Does the facility maintain a SWPPP or BMP plan? ☒ Yes ☐ No

Does the facility have a Storm Water monitoring program? ☒ Yes ☐ No

Approximate distance to receiving water body? ☒ < 200 ft. ☐ 200 - 1000 ft. ☐ > 1000 ft.

THREAT TO WATER QUALITY

☒ High ☐ Medium ☐ Low



### C. Initial Observations

Initial Observations / Conditions Of Concern:

Discharge Points:

Five storm drains on site; perimeter runoff to channel connected directly to Forester Creek.

Approximate area covered by industrial or commercial activities: 6 acres

Approximate % of impervious surface of this area: 90

Exposed areas of significant outdoor activity and/or storage: ☒ Permanent ☐ Occasional ☐ None

### D. BMP Assessment

Result

(bold indicates corrective actions required)

#### D.1 General BMPs

N/A FI PI NI

- |   |   |                                     |                                     |                                     |                          |
|---|---|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 1 | Keep site free of litter, debris, and sediment using dry methods                        | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2 | Keep parking lots, sidewalks, and streets free of sediment and debris using dry methods | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3 | Keep outdoor areas free of leaks and spills   | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4 | Collect water from pressure washing or hosing and dispose of appropriately              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| 5 | Direct roof downspouts away from areas of potential pollutants                          | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |

Comments: Roof sediment, eroded soil on ground throughout. More frequent sweeping. Filters on drains should be installed. Piles of rust powder should be swept up. Reverse osmosis plant leaking.

#### Landscaping BMPs

N/A FI PI NI

- |   |  |                                     |                          |                          |                                     |
|---|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| 1 | Properly manage pesticides/fertilizer; use IPM when feasible                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 2 | Employ adequate erosion prevention measures (vegetation or physical stabilization) | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3 | Minimize over watering/over-irrigation   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 4 | Properly store stockpiles to prevent material transport                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 5 | Properly store and dispose of green waste  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

Comments: Erosion of bare soil on site along channel that leads to Forester Creek. Concrete berm in place of sand bags recommended.

#### D.3 BMPs for Materials & Waste

N/A FI PI NI

- |    |   |                          |                                     |                                     |                                     |
|----|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| 1  | Protect trash area from contact with storm water                      | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 2  | Keep trash area free of litter and debris, liquids, powders, sediment | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 3  | Adequately cover materials stored outside                             | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 4  | Prevent run-on from contacting materials stored outdoors              | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 5  | Properly label outdoor storage containers                             | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 6  | Provide an accessible, functional, spill response kit                 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 7  | Equip liquid storage containers with secondary containment            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 8  | Keep secondary containment free of spills and rainwater               | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 9  | Properly store and dispose of hazardous materials                     | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 10 | Keep loading and unloading areas, including drains, free of debris    | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |



D. BMP Assessment (continued)		Result			
		(bold indicates corrective actions required)			
<b>BMPs for Materials &amp; Waste (continued)</b>		<b>N/A</b>	<b>FI</b>	<b>PI</b>	<b>NI</b>
11	Dispose of water generated by processing activities appropriately	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12	Dispose of pool, spa, fountain, and filter backwash water properly	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13	Clean floor mats in locations that do not drain to storm drain system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: <u>Rusted beams, scrap metal (with oil residue), rusted drums, rusted door (used to hold hz waste drums) should be covered. Rust has leached into ground and should be cleaned. Reverse osmosis plant on site.</u>					
<b>D.4 BMPs for Equipment, Vehicles, and Outdoor Activities</b>		<b>N/A</b>	<b>FI</b>	<b>PI</b>	<b>NI</b>
1	Conduct outdoor activities within contained areas (garage, under canopy, work shop)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	Use drip pans to collect leaks/spills	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Drain fluids from all non-operational vehicles stored outdoors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Provide materials (berm, mat, etc.) to protect storm drain inlets from spills and leaks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Perform vehicle/equipment washing in a contained area where runoff does not enter the MS4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: <u>Welding/grinding outdoor area not covered. Area should be covered.</u>					
<b>D.5 Other BMPs</b>		<b>N/A</b>	<b>FI</b>	<b>PI</b>	<b>NI</b>
1	Manage animal waste in a manner that prevents animal waste being transported in runoff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Keep grease bin and area surrounding grease bin free of grease stains/spills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Keep storm drain inlets free of grease and other food debris	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Identify and eliminate illicit connections and illegal discharges	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	Provide storm water training for appropriate employees	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments:					
<b>D.6 Additional Required Actions</b>					
Increase frequency of sweeping (sweeper truck recommended), sweep up rust powder, clean rust stains, sweep up piles of roof sediment/ eroded soil, fix leaking osmosis plant, install filters into drains, concrete berm recommended, cover outdoor storage listed in B.3 comments, cover welding/grinding area.					
<input checked="" type="checkbox"/> Based on inspection findings, it appears likely that significant levels of <u>metals, TPS, TSS</u> would be present in storm water discharges from this site. Take action to reduce the levels of pollutants to the maximum extent practicable. Treatment control BMPs are likely necessary.					
Owner/Operator has been notified of recommended corrective actions verbally: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, explain:					
Please refer to <a href="http://www.ci.el-cajon.ca.us/dept/works/stormwater.html">www.ci.el-cajon.ca.us/dept/works/stormwater.html</a> for more information on BMP implementation options.					
<b>D.7 Additional Questions</b>		<b>Comments / Results</b>			
Are there any potential air sources that could contribute to atmospheric deposition of pollutants?		<input checked="" type="checkbox"/> None <input type="checkbox"/> Painting <input type="checkbox"/> Fueling <input type="checkbox"/> Dust Dispersion or Mineral Processing <input type="checkbox"/> Sandblasting <input type="checkbox"/> Metal Smelting/Plating/Anodizing <input type="checkbox"/> Chem Production / Mix <input type="checkbox"/> Incinerator/Fuel Burning <input type="checkbox"/> Other			
Are there any treatment control BMPs on site? If yes, fill in the type and answer the three questions below.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Type(s):			
Are present treatment control BMPs regularly maintained?		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A			
Approx. % of site that drains to treatment control BMPs?		<input checked="" type="checkbox"/> N/A			
Do major potential pollutant sources drain to treatment control BMPs?		<input type="checkbox"/> All <input type="checkbox"/> Some <input type="checkbox"/> None <input checked="" type="checkbox"/> N/A			
Any illicit connections been identified...		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A			
Have the appropriate authorities been notified?		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A			
Were they eliminated during the site visit?		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A			

Were any non IC/ID-related corrective actions implemented during the site visit?

☐ Yes ☒ No

any educational materials distributed?

☐ Yes ☐ No ☒ N/A

**D.8 Additional BMP Questions for Eating Establishments (only)**

☒ N / A

1 Is a spill kit present adjacent to grease storage areas?

Yes No N/A

2 Does the facility have grease interceptors or traps on all fixtures?

Interceptor Traps (all) Traps (some) No

3 Are suitable spill proof containers present and used for grease transfer and storage?

Yes No N/A

4 Does the facility use a commercial dishwasher?

Yes No

5 Does the facility have a functional garbage disposal?

Yes No

6 Does the facility use drain screens on all fixtures?

Yes No

7 Are records for grease pick-up and removal manifests / logs available?

Yes No N/A

8 Are training materials and logs (for employees) available?

Yes No N/A

9 Is the facility displaying the City of El Cajon BMP Placard?

Yes No

Comments:

**E. State General Industrial Permit Compliance\***

☒ In Compliance / Commercial

Non-Compliance with the State Industrial Storm Water General Permit noted.

In the future, under a new Industrial Permit, which has not yet been adopted, this facility may be able to qualify for exemption from Permit coverage based on no outdoor exposure.

**ific Action(s) Required to Correct the Violation Described Above\*:**

File a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) to obtain coverage under the industrial permit - see Attachment 3 of the Industrial permit ([www.waterboards.ca.gov/stormwtr/industrial.html](http://www.waterboards.ca.gov/stormwtr/industrial.html)).

For "Conditional" facilities only: this site presently has outdoor exposure filing for coverage under the Industrial Permit. If you implement all of the recommended BMPs and eliminate outdoor exposure, you may be able to qualify for exemption from obtaining Industrial Permit coverage. Please contact the Regional Water Quality Control Board (RWQCB) for details ([www.swcrb.ca.gov/rwqcb9/](http://www.swcrb.ca.gov/rwqcb9/)).

Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) - see Section A of the Industrial Permit for guidelines.

Develop and implement a storm water monitoring program - see Section B of the Industrial Permit for guidelines.

Complete a Notice of Non-Applicability (NONA) and accompanying No Exposure Certification (NEC). Contact the RWQCB for details.

**F. Corrective Action Summary**

☒ **Corrective Actions Required** Please refer to Sections D and E of this form.

☐ No corrective actions required at this time.

**G. Recommended City Actions**

Follow up inspection

**General Assessment**

Level of knowledge regarding Storm Water issues:

☒ High ☐ Medium ☐ Low

Level of cleanliness, BMP implementation, and orderliness of the site:

☐ High ☐ Medium ☒ Low

**Follow-up Inspection Priority:** ☐ 1 ☒ 2 ☐ 3 ☐ None

Please note the Regional Water Quality Control Board (RWQCB) is the final arbiter of Industrial Permit compliance; please contact the RWQCB at (858) 467-2952 for details of what is necessary to comply with the Industrial Permit.

\*\*Recommended City actions listed at the time of inspection are subject to change based on later review by office staff.

MODE = MEMORY TRANSMISSION

START=MAR-25 07:37

END=MAR-25 07:41

FILE NO.=252

STN NO.	COMM.	ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK	2	5625776	006/006	00:02:50

-EL CAJON, CITY OF -

\*\*\*\*\* - PUBLIC WORKS - \*\*\*\*\*

## City of El Cajon

Public Works Department  
200 Civic Center Way  
El Cajon, CA 92020  
(619) 441-1853  
FAX (619) 579-5254



# Fax

To: DUANE HOLLANDER From: CRAIG BONNER  
Firm: VERIDIAM Pages: (6) incl. cover  
Fax: 562-5776 Date: 3-25-11  
Phone: \_\_\_\_\_ Subject: COPY OF INSPECTION  
REPORT.

☐ Urgent ☐ Per Request ☐ For Review ☐ Please Comment ☐ Please Reply

### • Comments:

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1.5 hr



# CITY OF EL CAJON

## STORM WATER COMPLIANCE INSPECTION FOR INDUSTRIAL AND COMMERCIAL FACILITIES

Inspected by D-MAX Engineering, Inc.

Inspector Name CRAIG BONNER Date 3/17/11 Time 10:00 AM PM  
Type of Inspection: ☒ Routine ☐ Follow-up ☐ Complaint Investigation  
Result: ☒ Full Insp. ☐ Could not Contact ☐ Not Inventoried ☐ Moved, Vacant ☐ Refused  
☐ Moved, Replaced by ☐ Follow-up (i.e. not full)  
☐ Out of Jurisdiction ☐ Duplicate of: ☐ Mobile

### A. CONTACT INFORMATION

Original	Changes
Business Name <u>VERIDIAM</u>	Business Name _____
Street Address <u>1717 CUYAMACA ST.</u> <u>92020</u>	Street Address _____ <input type="checkbox"/> change
Responsible Person(s) <u>DUANE HOLLANDER</u>	Responsible Person(s) _____
Title: <u>ENVIRON. MGR.</u>	Business Telephone # ( ) - ext. _____
Business Telephone # <u>(619) 596-4300</u> ext. _____	Business Fax # ( ) - _____
Business Fax # <u>(619) 562-1190</u>	
Home Based? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Mobile Business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is this facility located in a multi-suite complex? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Facility personnel present: <u>DUANE HOLLANDER</u>	

### B. FACILITY/SITE INFORMATION

Principal activity: MANUF. STEEL TUBES / PIPES

Assigned NAICS code(s) 3399 and/or SIC Code(s) 3999  
Does NAICS Code best represent principal activity: ☐ Yes ☒ No SIC? ☐ Yes ☒ No  
Recommended change of NAICS Code(s)? 33210 Of SIC? 3317

Existing NAICS code(s) \_\_\_\_\_ and SIC Code(s) \_\_\_\_\_

Status Update (if no longer active in City or does not need an inspection): ☐ Moved/Out of Business ☐ Duplicate  
☐ Not Inventoried ☐ Out of Jurisdiction

Does facility have a current business certificate? ☒ Yes ☐ No # 84147 Exp. 12/11  
Is facility subject to CA Statewide General Industrial Permit? ☒ Mandatory ☐ Conditional ☐ No  
Does facility have a Notice of Non-Applicability (NONA/NEC)? ☐ Yes ☒ No  
Has facility filed a Notice of Intent (NOI) to obtain coverage? ☒ Yes ☐ No WDID: 9 3710 20299  
Has facility filed a Notice Of Termination (NOT) for the WDID# listed above? ☐ Yes ☒ No Approval date: \_\_\_\_\_  
Does facility maintain SWPPP or BMP Plan? ☒ Yes ☐ No  
Does facility have a storm water monitoring program? ☒ Yes ☐ No

### C. INITIAL OBSERVATIONS

Approximate distance to receiving water body: ☒ < 200 ft. ☐ 200 - 1000 ft. ☐ > 1000 ft.  
Discharge points: FIVE STORM DRAINS ON SITE, PERIMETER RUNOFF TO CHANNEL CONNECTED TO FORRESTER CREEK.  
Approximate area covered by industrial or commercial activities: 6 ACRES square feet  
Approximate % impervious surface of this area 90 %  
Exposed areas of significant outdoor activity or storage? ☒ Permanent ☐ Occasional ☐ No

D. BMP ASSESSMENT					
BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
<b>D.1 General</b>					
Keep site free of litter, debris, and sediment using dry methods			/		MATERIAL STORAGE AREA
Keep parking lots, sidewalks, and streets free of sediment and debris using dry methods		/			
Keep outdoor areas free of spills and leaks		/			
Collect water from pressure washing or hosing and dispose of appropriately	/				<input type="checkbox"/> Unknown Performed by:
Direct roof downspouts away from areas of potential pollutants		/			
Sewer lateral(s) maintenance		/			
Establish a regular schedule for private sewer lateral maintenance	/				
<b>D.2 Landscaping</b>					
Properly manage pesticides/fertilizer; use IPM when feasible		/			<input type="checkbox"/> Unknown Landscaping Co:
Employ adequate erosion prevention measures (vegetation or physical stabilization)		/			
Minimize over watering/over-irrigation	/				
Properly store stockpiles to prevent material transport	/				
Properly store and dispose of green waste	/				<input type="checkbox"/> Unknown
<b>D.3 Materials and Wastes</b>					
Protect trash area from contact with storm water		/			
Keep trash area free of litter and debris, liquids, powders, sediment		/			
Adequately cover materials stored outside				/	
Prevent run-on from contacting materials stored outdoors			/		
Properly label outdoor storage containers		/			
Provide an accessible, functional spill response kit		/			
Equip liquid storage containers with secondary containment		/			
Keep secondary containment free of spills and rainwater		/			
Properly store and dispose of hazardous materials		/			
Keep loading and unloading areas, including drains, free of debris			/		CLEAN AND CURE DRAINS
Dispose of water generated by processing activities appropriately		/			
Dispose of pool, spa, fountain, and filter backwash water properly	/				<input type="checkbox"/> Unknown Performed by:



BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
Clean floor mats in locations that do not drain to storm drain system	/				
<b>D.4 Equipment, Vehicles, and Outdoor Activities</b>					
Conduct outdoor activities within contained areas (garage, under canopy, work shop)			✓		
Use drip pans to collect leaks/spills	/				
Drain fluids from all non-operational vehicles stored outdoors	/				
Vehicle and equipment fueling	/				
Provide materials (berm, mat, etc.) to protect storm drain inlets from spills and leaks		✓			
Perform vehicle/equipment washing in a contained area where runoff does not enter the MS4	/				
<b>D.5 Other</b>					
Manage animals and animal waste in a manner that prevents animal waste from being transported in runoff	/				
Keep grease bin and area surrounding e bin free of grease stains/spills	/				
Keep storm drain inlets free of grease and other food debris	/				
Identify and eliminate illicit connections and illegal discharges	/				
Provide storm water training for appropriate employees		✓			
<b>D.6 ADDITIONAL REQUIRED ACTIONS</b>					
① INSTALL FILTER INSERTS FOR LOT DRAINS, ② REMOVE OR COVER MATERIALS STORED OUTDOORS. ③ SWEEP PAVED AREAS REGULARLY ④ LABEL DRAIN INLETS (PAINT)					
<input type="checkbox"/> Based on inspection findings, it appears likely that significant levels of <u>METALS / DEBRIS</u> would be present in storm water discharges from this site. Take action to reduce the levels of <u>" "</u> to the maximum extent practicable. Treatment control BMPs are likely necessary.					
Owner/operator has been notified of recommended corrective actions both verbally and by: <input checked="" type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Fax					
Please refer to <a href="http://www.ci.el-cajon.ca.us/dept/works/stormwater.html">http://www.ci.el-cajon.ca.us/dept/works/stormwater.html</a> for more information on BMP implementation options.					
<b>D.7 Additional Questions</b>			<b>Comments/Results</b>		
Are there any potential air sources that could contribute to atmospheric deposition of pollutants?			<input checked="" type="checkbox"/> Painting <input type="checkbox"/> Sandblasting <input type="checkbox"/> Fuel Distribution <input checked="" type="checkbox"/> Dust dispersion or mineral processing <input type="checkbox"/> Metal smelting <input type="checkbox"/> Metal plating or anodizing <input type="checkbox"/> Chemical production or mixing <input type="checkbox"/> Large fuel burning device <input type="checkbox"/> Incinerator		
Does facility have a grease trap or grease interceptor?			<input checked="" type="checkbox"/> No <input type="checkbox"/> Grease Trap <input type="checkbox"/> Grease Interceptor <input type="checkbox"/> Unknown		
Are there any treatment control BMPs on site?			<input type="checkbox"/> Filter insert <input type="checkbox"/> Hydrodynamic separator <input type="checkbox"/> Debris screen <input type="checkbox"/> Sewer diversion <input type="checkbox"/> Vegetated swale <input type="checkbox"/> Vegetated filter strip <input type="checkbox"/> Biofiltration <input type="checkbox"/> Detention/sedimentation basin <input type="checkbox"/> Containment and evaporation or reuse <input type="checkbox"/> Filtration		
Are treatment control BMPs regularly maintained?			<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> N/A		



What is the approximate percentage of the site that drains to the treatment control BMPs?	<input checked="" type="checkbox"/> N/A
Do major potential pollutant sources drain to treatment BMPs?	<input type="checkbox"/> All <input type="checkbox"/> Some <input type="checkbox"/> None <input checked="" type="checkbox"/> N/A
If any illicit connections and/or illegal discharges were identified have the appropriate authorities been notified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If any illicit connections and/or illegal discharges were identified, were they eliminated during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Were any non IC/ID related corrective actions implemented during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Were any educational materials distributed?	NOI NONA/NEC IF IF-S SP SP-SIS IS-S AF AF-S DU DU-S MB <i>DRAFT INDUSTRIAL</i>

#### E. STATE GENERAL INDUSTRIAL PERMIT COMPLIANCE\*

- ☐ Non-compliance with the State Industrial Storm Water General Permit noted.
- ☐ In the future, under a new Industrial Permit, which has not yet been adopted, this facility may be able to qualify for exemption from Permit coverage based on no outdoor exposure.

#### SPECIFIC ACTION(S) REQUIRED TO CORRECT THE VIOLATION DESCRIBED ABOVE\*:

- ☐ File a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) to obtain coverage under the Industrial Permit—see Attachment 3 of the Industrial Permit ([www.waterboards.ca.gov/stormwtr/industrial.html](http://www.waterboards.ca.gov/stormwtr/industrial.html)).
- ☐ For "Conditional" facilities only: this site presently has outdoor exposure that requires filing for coverage under the Industrial Permit. If you implement all the recommended BMPs and eliminate outdoor exposure, you may be able to qualify for exemption from obtaining Industrial Permit coverage. Please contact the RWQCB for details.
- ☐ Develop and implement a Storm Water Pollution Prevention Plan (SWPPP)—see Section A of the Industrial Permit.
- ☐ Develop and implement a storm water monitoring program—see section B of the Industrial Permit for guidelines.
- ☐ Complete the provided Notice of Non-Applicability (NONA) and accompanying No Exposure Certification (NEC).

Additional notes and/or actions required:

#### F. CORRECTIVE ACTION SUMMARY

- ☒ **Corrective Actions Required.** Please refer to sections D.1-D.6 and E of this form
- ☐ No Corrective Actions Required at this Time.

#### G. RECOMMENDED CITY ACTIONS\*\*

Follow Up Inspection Priority: ☐ Priority 1 ☐ Priority 2 ☒ Priority 3

#### ASSESSMENT

Level of knowledge regarding stormwater issues: ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5

Level of cleanliness, BMP implementation, orderliness of site: ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5

\*Please note that the Regional Water Quality Control Board (RWQCB) is the final arbiter of Industrial Permit compliance; please contact the RWQCB at (858) 467-2952 for details of what is necessary to comply with the Industrial Permit.

\*\*Recommended City actions listed at the time of inspection are subject to change based on later review by office staff.



1717 COYAMACA

3-17-11



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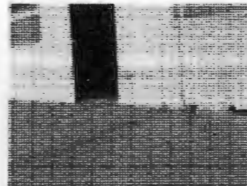
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# City of El Cajon

Public Works Department  
200 Civic Center Way  
El Cajon, CA 92020  
(619) 441-1653  
FAX (619) 579-5254



## Fax

To: DUANE HOLLANDER From: CRAIG BONNER  
Firm: VERIDIAM Pages: (6) incl. cover  
Fax: 562-5776 Date: 3-25-11  
Phone: \_\_\_\_\_ Subject: COPY OF INSPECTION  
REPORT.

☐ Urgent ☐ Per Request ☐ For Review ☐ Please Comment ☐ Please Reply

### • Comments:

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# CITY OF EL CAJON

## STORM WATER COMPLIANCE INSPECTION FOR INDUSTRIAL AND COMMERCIAL FACILITIES

Inspected by D-MAX Engineering, Inc.

Handwritten: *Handwritten*

Inspector Name CRAIG BONNER Date 3/28/12 Time 10:00 AM PM

Type of Inspection: Result: ☒ Full Insp. ☐ Could not Contact ☐ Not Inventoried ☐ Moved, Vacant ☐ Refused  
☒ Routine ☐ Follow-up ☐ Moved, Replaced by ☐ Follow-up (i.e. not full)  
☐ Complaint Investigation ☐ Out of Jurisdiction ☐ Duplicate of: ☐ Mobile

### A. CONTACT INFORMATION

Original	Changes
Business Name <u>VERIDIAM</u>	Business Name _____
Street Address <u>1717 N. CUYAMACA</u> <u>92020</u>	Street Address _____ <input type="checkbox"/> change _____
Responsible Person(s) <u>DUANE HOLLANDER</u>	Responsible Person(s) _____
Title: _____	Business Telephone # ( ) - ext. _____
Business Telephone # <u>(619) 596-4300</u> ext. _____	Business Fax # ( ) - _____
Business Fax # <u>(619) 562-1190</u>	
Home Based? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Mobile Business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is this facility located in a multi-suite complex? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Facility personnel present: <u>DUANE HOLLANDER</u>	

### B. FACILITY/SITE INFORMATION

Principal activity: MANUFACTURE STEEL TUBES AND PIPES

Assigned NAICS code(s) 3399 and/or SIC Code(s) 3999  
Does NAICS Code best represent principal activity: ☐ Yes ☐ No SIC?: ☐ Yes ☐ No  
Recommended change of NAICS Code(s)? \_\_\_\_\_ Of SIC? \_\_\_\_\_

Existing NAICS code(s) \_\_\_\_\_ and SIC Code(s) \_\_\_\_\_

Status Update (if no longer active in City or does not need an inspection): ☐ Moved/Out of Business ☐ Duplicate  
☐ Not Inventoried ☐ Out of Jurisdiction

Does facility have a current business certificate? ☒ Yes ☐ No # 84147 Exp. 12/12  
Is facility subject to CA Statewide General Industrial Permit? ☒ Mandatory ☐ Conditional ☐ No  
Does facility have a Notice of Non-Applicability (NONA/NEC)? ☐ Yes ☒ No  
Has facility filed a Notice of Intent (NOI) to obtain coverage? ☒ Yes ☐ No WDID: 93710 20299  
Has facility filed a Notice Of Termination (NOT) for the WDID# listed above? ☐ Yes ☒ No Approval date: \_\_\_\_\_ month/yr  
Does facility maintain SWPPP or BMP Plan? ☒ Yes ☐ No  
Does facility have a storm water monitoring program? ☒ Yes ☐ No

### C. INITIAL OBSERVATIONS

Approximate distance to receiving water body: ☒ < 200 ft. ☐ 200 - 1000 ft. ☐ > 1000 ft.  
Discharge points: FIVE STORM DRAINS ON SITE, PERIMETER RUNOFF TO  
CHANNEL CONNECTED TO FORRESTER CREEK  
Approximate area covered by industrial or commercial activities: 6 ACRES square feet  
Approximate % impervious surface of this area 90 %  
Exposed areas of significant outdoor activity or storage? ☒ Permanent ☐ Occasional ☐ No

Handwritten: *Handwritten*

## D. BMP ASSESSMENT

BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
<b>D.1 General</b>					
Keep site free of litter, debris, and sediment using dry methods		/			
Keep parking lots, sidewalks, and streets free of sediment and debris using dry methods		/			
Keep outdoor areas free of spills and leaks		/			
Collect water from pressure washing or hosing and dispose of appropriately	/				<input type="checkbox"/> Unknown Performed by:
Direct roof downspouts away from areas of potential pollutants		/			
Sewer lateral(s) maintenance		/			
Establish a regular schedule for private sewer lateral maintenance	/				
<b>D.2 Landscaping</b>					
Properly manage pesticides/fertilizer; use IPM when feasible		/			<input type="checkbox"/> Unknown Landscaping Co:
Employ adequate erosion prevention measures (vegetation or physical stabilization)		/			
Minimize over watering/over-irrigation		/			
Properly store stockpiles to prevent material transport	/				
Properly store and dispose of green waste		/			<input type="checkbox"/> Unknown
<b>D.3 Materials and Wastes</b>					
Protect trash area from contact with storm water			/		
Keep trash area free of litter and debris, liquids, powders, sediment		/			
Adequately cover materials stored outside			/		
Prevent run-on from contacting materials stored outdoors			/		
Properly label outdoor storage containers		/			
Provide an accessible, functional spill response kit		/			
Equip liquid storage containers with secondary containment			/		
Keep secondary containment free of spills and rainwater		/			
Properly store and dispose of hazardous materials		/			
Keep loading and unloading areas, including drains, free of debris		/			
Dispose of water generated by processing activities appropriately		/			
Dispose of pool, spa, fountain, and filter backwash water properly	/				<input type="checkbox"/> Unknown Performed by:



BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
Clean floor mats in locations that do not drain to storm drain system	<input checked="" type="checkbox"/>				

#### D.4 Equipment, Vehicles, and Outdoor Activities

Conduct outdoor activities within contained areas (garage, under canopy, work shop)	<input checked="" type="checkbox"/>				
Use drip pans to collect leaks/spills	<input checked="" type="checkbox"/>				
Drain fluids from all non-operational vehicles stored outdoors	<input checked="" type="checkbox"/>				
Vehicle and equipment fueling	<input checked="" type="checkbox"/>				
Provide materials (berm, mat, etc.) to protect storm drain inlets from spills and leaks	<input checked="" type="checkbox"/>				
Perform vehicle/equipment washing in a contained area where runoff does not enter the MS4	<input checked="" type="checkbox"/>				

#### D.5 Other

Manage animals and animal waste in a manner that prevents animal waste from being transported in runoff	<input checked="" type="checkbox"/>				
Keep grease bin and area surrounding grease bin free of grease stains/spills	<input checked="" type="checkbox"/>				
Keep storm drain inlets free of grease and other food debris	<input checked="" type="checkbox"/>				
Identify and eliminate illicit connections and illegal discharges	<input checked="" type="checkbox"/>				
Provide storm water training for appropriate employees	<input checked="" type="checkbox"/>				

#### D.6 ADDITIONAL REQUIRED ACTIONS

#1) INSTALL BERM AROUND OUTDOOR TANK / WORK AREA (SEE PHOTO) #1 #2) REMOVE ALL UNCOVERED MATERIALS STORED OUTDOORS OR COVER. #3) SWEEP ALL PAVED AREAS DAILY. #4) DRAIN WATER FROM METAL TANKS ON GRASS LOT.

☐ Based on inspection findings, it appears likely that significant levels of \_\_\_\_\_ would be present in storm water discharges from this site. Take action to reduce the levels of \_\_\_\_\_ to the maximum extent practicable. Treatment control BMPs are likely necessary.

Owner/operator has been notified of recommended corrective actions both verbally and by: ☒ Hand ☐ Mail ☐ Fax

Please refer to <http://www.ci.el-cajor.ca.us/dept/works/stormwater.html> for more information on BMP implementation options.

#### D.7 Additional Questions

#### Comments/Results

Are there any potential air sources that could contribute to atmospheric deposition of pollutants?	<input type="checkbox"/> Painting <input type="checkbox"/> Sandblasting <input type="checkbox"/> Fuel Distribution <input type="checkbox"/> Dust dispersion or mineral processing <input type="checkbox"/> Metal smelting <input type="checkbox"/> Metal plating or anodizing <input type="checkbox"/> Chemical production or mixing <input type="checkbox"/> Large fuel burning device <input type="checkbox"/> Incinerator
Does facility have a grease trap or grease interceptor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Grease Trap <input type="checkbox"/> Grease Interceptor <input type="checkbox"/> Unknown
Are there any treatment control BMPs on site?	<input type="checkbox"/> Filter insert <input type="checkbox"/> Hydrodynamic separator <input type="checkbox"/> Debris screen <input type="checkbox"/> Sewer diversion <input type="checkbox"/> Vegetated swale <input type="checkbox"/> Vegetated filter strip <input type="checkbox"/> Biofiltration <input type="checkbox"/> Detention/sedimentation basin <input type="checkbox"/> Containment and evaporation or reuse <input type="checkbox"/> Filtration
Are treatment control BMPs regularly maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> N/A

What is the approximate percentage of the site that drains to the treatment control BMPs?	<input checked="" type="checkbox"/> N/A																				
Do major potential pollutant sources drain to treatment BMP(s)?	<input type="checkbox"/> All <input type="checkbox"/> Some <input type="checkbox"/> None <input checked="" type="checkbox"/> N/A																				
If any illicit connections and/or illegal discharges were identified have the appropriate authorities been notified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A																				
If any illicit connections and/or illegal discharges were identified, were they eliminated during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A																				
Were any non IC/ID related corrective actions implemented during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A																				
Were any educational materials distributed?	<table border="0"> <tr> <td>NOI</td> <td>NONA/NEC</td> <td>IF</td> <td>IF-S</td> <td>SP</td> <td>SP-S</td> <td>IS</td> <td>IS-S</td> <td>AF</td> <td>AF-S</td> </tr> <tr> <td>DU</td> <td>DU-S</td> <td>MB</td> <td colspan="4">SWPPP DETAILS</td> <td colspan="3">PDP ASSESS.</td> </tr> </table>	NOI	NONA/NEC	IF	IF-S	SP	SP-S	IS	IS-S	AF	AF-S	DU	DU-S	MB	SWPPP DETAILS				PDP ASSESS.		
NOI	NONA/NEC	IF	IF-S	SP	SP-S	IS	IS-S	AF	AF-S												
DU	DU-S	MB	SWPPP DETAILS				PDP ASSESS.														

#### E. STATE GENERAL INDUSTRIAL PERMIT COMPLIANCE\*

- ☐ Non-compliance with the State Industrial Storm Water General Permit noted.
- ☐ In the future, under a new Industrial Permit, which has not yet been adopted, this facility may be able to qualify for exemption from Permit coverage based on no outdoor exposure.

#### SPECIFIC ACTION(S) REQUIRED TO CORRECT THE VIOLATION DESCRIBED ABOVE\*:

- ☐ File a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) to obtain coverage under the Industrial Permit—see Attachment 3 of the Industrial Permit ([www.waterboards.ca.gov/stormwtr/industrial.html](http://www.waterboards.ca.gov/stormwtr/industrial.html)).
- ☐ For "Conditional" facilities only: this site presently has outdoor exposure that requires filing for coverage under the Industrial Permit. If you implement all the recommended BMPs and eliminate outdoor exposure, you may be able to qualify for exemption from obtaining Industrial Permit coverage. Please contact the RWQCB for details.
- ☐ Develop and implement a Storm Water Pollution Prevention Plan (SWPPP)—see Section A of the Industrial Permit.
- ☐ Develop and implement a storm water monitoring program—see section B of the Industrial Permit for guidelines.
- ☐ Complete the provided Notice of Non-Applicability (NONA) and accompanying No Exposure Certification (NEC).

Additional notes and/or actions required:

#### F. CORRECTIVE ACTION SUMMARY

- ☒ Corrective Actions Required. Please refer to sections D.1-D.6 and E of this form.
- ☐ No Corrective Actions Required at this Time.

#### G. RECOMMENDED CITY ACTIONS\*\*

Follow Up Inspection Priority: ☐ Priority 1 ☐ Priority 2 ☒ Priority 3

#### ASSESSMENT

Level of knowledge regarding stormwater issues: ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5

Level of cleanliness, BMP implementation, orderliness of site: ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5

\*Please note that the Regional Water Quality Control Board (RWQCB) is the final arbiter of Industrial Permit compliance; please contact the RWQCB at (858) 467-2952 for details of what is necessary to comply with the Industrial Permit.

\*\*Recommended City actions listed at the time of inspection are subject to change based on later review by office staff.



VERIDIAN

3-28-12



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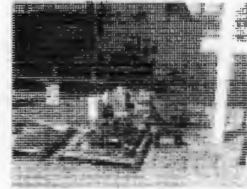
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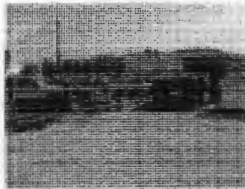
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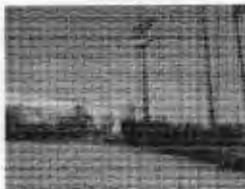
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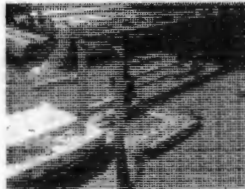
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**CITY OF EL CAJON**  
**STORM WATER COMPLIANCE INSPECTION**  
Inspected by D-Max Engineering, Inc.

Inspector Name C. Bonner Date 1/30/13 Time 10:00 AM / PM  
Type of Inspection: Result: ☒ Full Insp. ☐ Could not Contact ☐ Not Inventoried ☐ Moved, Vacant ☐ Refused  
☒ Routine ☐ Follow-up ☐ Moved, Replaced by ☐ Follow-up (i.e. not full)  
☐ Complaint Investigation ☐ Out of Jurisdiction ☐ Duplicate of: ☐ Mobile

**A. CONTACT INFORMATION**

Original	Changes
Business Name <u>VERIDIAM</u>	Business Name _____
Street Address <u>1717 N. CUYAMACA</u> <u>92020</u>	Street Address _____ <input type="checkbox"/> change _____
Responsible Person(s) <u>ANDY GALE</u> Title: <u>OWNER</u>	Responsible Person(s) <u>TOM CRESANTE</u> Business Telephone # <u>(619) 596-4303</u> ext. _____
Business Telephone # <u>(619) 596-4300</u> ext. _____	Business Fax # <u>596-4303</u>
Business Fax # <u>(619) 562-1190</u>	
Home Based? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Mobile Business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is this facility located in a multi-suite complex? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Facility personnel present: <u>DUANE HOLLANDER</u>	

**B. FACILITY/SITE INFORMATION**

Principal activity: ROLLED STEEL MANUFACTURING

Assigned NAICS code(s) 33122 and/or SIC Code(s) 3312  
Does NAICS Code best represent principal activity: ☐ Yes ☐ No SIC? ☒ Yes ☐ No  
Recommended change of NAICS Code(s)? \_\_\_\_\_ Of SIC? \_\_\_\_\_

Existing NAICS code(s) \_\_\_\_\_ and SIC Code(s) \_\_\_\_\_

Status Update (if no longer active in City or does not need an inspection): ☐ Moved/Out of Business ☐ Duplicate  
☐ Not Inventoried ☐ Out of Jurisdiction

Does facility have a current business certificate? ☒ Yes ☐ No # 0084147 Exp. 12/13  
Is facility subject to CA Statewide General Industrial Permit? ☒ Mandatory ☐ Conditional ☐ No  
Does facility have a Notice of Non-Applicability (NONA/NEC)? ☐ Yes ☒ No  
Has facility filed a Notice of Intent (NOI) to obtain coverage? ☒ Yes ☐ No WDID: 9 3710 20299  
Has facility filed a Notice Of Termination (NOT) for the WDID# listed above? ☐ Yes ☒ No Approval date: \_\_\_\_\_  
Does facility maintain SWPPP or BMP Plan? ☒ Yes ☐ No monthly  
Does facility have a storm water monitoring program? ☒ Yes ☐ No

**C. INITIAL OBSERVATIONS**

Approximate distance to receiving water body: ☒ < 200 ft. ☐ 200 - 1000 ft. ☐ > 1000 ft.  
Discharge points: FIVE STORMDRAINS ON SITE; PERIMETER RUNOFF TO NATURAL CHANNEL.  
Approximate area covered by industrial or commercial activities: 6 ACRES square feet  
Approximate % impervious surface of this area 90 %  
Exposed areas of significant outdoor activity or storage? ☒ Permanent ☐ Occasional ☐ No



# D. BMP ASSESSMENT

BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
<b>D.1 General</b>					
Keep site free of litter, debris, and sediment using dry methods		/			
Keep parking lots, sidewalks, and streets free of sediment and debris using dry methods		/			
Keep outdoor areas free of spills and leaks		/			
Collect water from pressure washing or hosing and dispose of appropriately	/				<input type="checkbox"/> Unknown Performed by:
Direct roof downspouts away from areas of potential pollutants		/			
Sewer lateral(s) maintenance		/			
Establish a regular schedule for private sewer lateral maintenance	/				
<b>D.2 Landscaping</b>					
Properly manage pesticides/fertilizer; use IPM when feasible	/				<input type="checkbox"/> Unknown Landscaping Co:
Employ adequate erosion prevention measures (vegetation or physical stabilization)	/				
Minimize over watering/over-irrigation		/			
Properly store stockpiles to prevent material transport	/				
Properly store and dispose of green waste		/			<input type="checkbox"/> Unknown
<b>D.3 Materials and Wastes</b>					
Protect trash area from contact with storm water		/			
Keep trash area free of litter and debris, liquids, powders, sediment		/			
Adequately cover materials stored outside				/	
Prevent run-on from contacting materials stored outdoors				/	
Properly label outdoor storage containers		/			
Provide an accessible, functional spill response kit		/			
Equip liquid storage containers with secondary containment		/			
Keep secondary containment free of spills and rainwater		/			
Properly store and dispose of hazardous materials		/			
Keep loading and unloading areas, including drains, free of debris		/			
Dispose of water generated by processing activities appropriately	/				
Dispose of pool, spa, fountain, and filter backwash water properly	/				<input type="checkbox"/> Unknown Performed by:

BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	

Clean floor mats in locations that do not drain to storm drain system

✓

#### D.4 Equipment, Vehicles, and Outdoor Activities

Conduct outdoor activities within contained areas (garage, under canopy, work shop)

✓

MACHINE / WELD SHOP.

Use drip pans to collect leaks/spills

✓

Drain fluids from all non-operational vehicles stored outdoors

✓

Vehicle and equipment fueling

✓

Provide materials (berm, mat, etc.) to protect storm drain inlets from spills and leaks

✓

Perform vehicle/equipment washing in a contained area where runoff does not enter the MS4

✓

NOT ALLOWED ON SITE

#### D.5 Other

Manage animals and animal waste in a manner that prevents animal waste from being transported in runoff

✓

Keep grease bin and area surrounding grease bin free of grease stains/spills

✓

Keep storm drain inlets free of grease and other food debris

✓

Identify and eliminate illicit connections and illegal discharges

✓

Provide storm water training for appropriate employees

✓

#### D.6 ADDITIONAL REQUIRED ACTIONS

(#1) INSTALL FILTER DEVICE AT ALL AREA STORM DRAINS. (ABSORBENT SOCK AT DRAIN) (#2) SEE PHOTO (#2) MACHINE/WELD SHOP AT NORTH SIDE OF BUILDING MUST BE COVERED (#3) COVER ALL WASTE METAL BINS. (SEE PHOTOS)

☐ Based on inspection findings, it appears likely that significant levels of METALS would be present in storm water discharges from this site. Take action to reduce the levels of " to the maximum extent practicable. Treatment control BMPs are likely necessary.

Owner/operator has been notified of recommended corrective actions both verbally and by: ☐ Hand ☐ Mail ☒ Fax

Please refer to <http://www.ci.el-cajon.ca.us/dept/works/stormwater.html> for more information on BMP implementation options.

#### D.7 Additional Questions

#### Comments/Results

Are there any potential air sources that could contribute to atmospheric deposition of pollutants?

☐ Painting ☐ Sandblasting ☐ Fuel Distribution ☐ Dust dispersion or mineral processing ☐ Metal smelting ☐ Metal plating or anodizing ☐ Chemical production or mixing ☐ Large fuel burning device ☐ Incinerator

Does facility have a grease trap or grease interceptor?

☐ No ☐ Grease Trap ☐ Grease Interceptor ☐ Unknown

Are there any treatment control BMPs on-site?

☐ Filter insert ☐ Hydrodynamic separator ☒ Debris screen ☐ Sewer diversion ☐ Vegetated swale ☐ Vegetated filter strip ☐ Biofiltration ☐ Detention/sedimentation basin ☐ Containment and evaporation or reuse ☐ Filtration

Are treatment control BMPs regularly maintained?

☒ Yes ☐ No ☐ Unknown ☐ N/A



What is the approximate percentage of the site that drains to the treatment control BMPs? <b>95</b>	<input type="checkbox"/> N/A
Do major potential pollutant sources drain to treatment?	<input type="checkbox"/> All <input checked="" type="checkbox"/> Some <input type="checkbox"/> None <input type="checkbox"/> N/A
Illicit connections and/or illegal discharges were identified have the appropriate authorities been notified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If any illicit connections and/or illegal discharges were identified, were they eliminated during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Were any non IC/ID related corrective actions implemented during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Were any educational materials distributed?	NOI NONA/NEC IF IF-S SP SP-S IS IS-S AF AF-S DU DU-S MB

### E. STATE GENERAL INDUSTRIAL PERMIT COMPLIANCE\*

- ☐ Non-compliance with the State Industrial Storm Water General Permit noted.
- ☐ In the future, under a new Industrial Permit, which has not yet been adopted, this facility may be able to qualify for exemption from Permit coverage based on no outdoor exposure.

#### SPECIFIC ACTION(S) REQUIRED TO CORRECT THE VIOLATION DESCRIBED ABOVE\*:

- ☐ File a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) to obtain coverage under the Industrial Permit—see Attachment 3 of the Industrial Permit ([www.waterboards.ca.gov/stormwtr/industrial.html](http://www.waterboards.ca.gov/stormwtr/industrial.html)).
- ☐ For "Conditional" facilities only: this site presently has outdoor exposure that requires filing for coverage under the Industrial Permit. If you implement all the recommended BMPs and eliminate outdoor exposure, you may be able to qualify for exemption from obtaining Industrial Permit coverage. Please contact the RWQCB for details.
- ☐ Develop and implement a Storm Water Pollution Prevention Plan (SWPPP)—see Section A of the Industrial Permit.
- Develop and implement a storm water monitoring program--see section B of the Industrial Permit for guidelines.
- ☒ Complete the provided Notice of Non-Applicability (NONA) and accompanying No Exposure Certification (NEC).

Additional notes and/or actions required:

### F. CORRECTIVE ACTION SUMMARY

- ☒ Corrective Actions Required. Please refer to sections D.1-D.6 and E of this form
- ☐ No Corrective Actions Required at this Time.

### G. RECOMMENDED CITY ACTIONS\*\*

Follow Up Inspection Priority: ☐ Priority 1 ☐ Priority 2 ☒ Priority 3

#### ASSESSMENT

Level of knowledge regarding stormwater issues:	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input checked="" type="checkbox"/> 4	<input type="checkbox"/> 5
Level of cleanliness, BMP implementation, orderliness of site:	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input checked="" type="checkbox"/> 4	<input type="checkbox"/> 5

\*Please note that the Regional Water Quality Control Board (RWQCB) is the final arbiter of Industrial Permit compliance; please contact the RWQCB at (858) 467-2952 for details of what is necessary to comply with the Industrial Permit.

\*\*Recommended City actions listed at the time of inspection are subject to change based on later review by office staff.



VERIDIAN 1-30-13

①

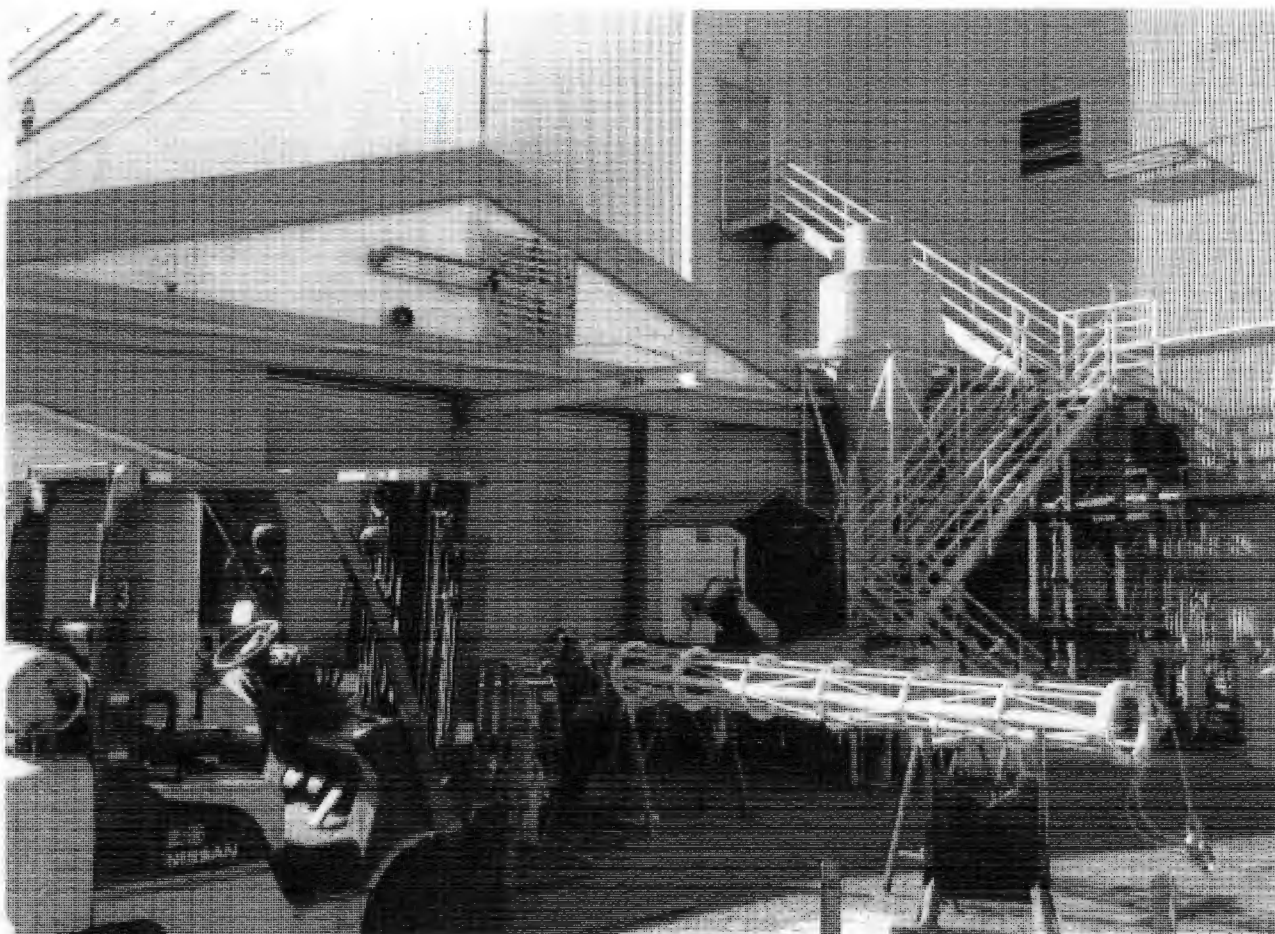


②





(3)



(4)





# City of El Cajon

Public Works Department  
200 Civic Center Way  
El Cajon, CA 92020  
(619) 441-1653  
FAX (619) 579-5254



## Fax

To: DUANE HOLLANDER From: C. BONNER  
Firm: VERIDIAM Pages: ~~8~~ 7  
Fax: 562-1190 Date: 2-7-13  
Phone: \_\_\_\_\_ Subject: \_\_\_\_\_

☐ Urgent ☐ Per Request ☐ For Review ☐ Please Comment ☐ Please Reply

### • Comments:

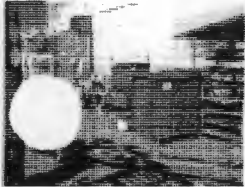
\* COPY OF ANNUAL STORM  
WATER INSPECTION REPORT.



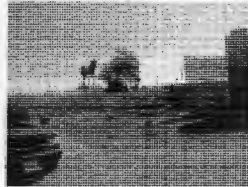
VERIDIAM

1-30-13

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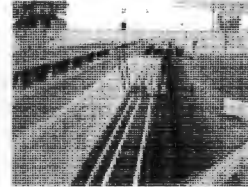
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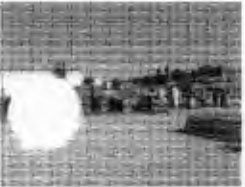
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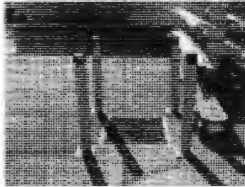
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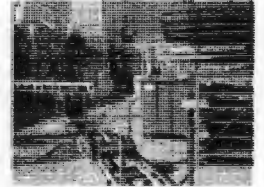
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MODE = MEMORY TRANSMISSION

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FILE NO.=411

STN NO.	COMM.	ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK		5621190	007/007	00:01:07

-EL CAJON, CITY OF -

\*\*\*\*\* - PUBLIC WORKS - \*\*\*\*\*

## City of El Cajon

Public Works Department  
200 Civic Center Way  
El Cajon, CA 92020  
(619) 441-1653  
FAX (619) 579-5254



# Fax

To: DUANE HOLLANDER	From: C. BONNER
Firm: VERIDIAM	Pages: 7
Fax: 562-1190	Date: 2-7-13
Phone:	Subject:

☐ Urgent ☐ Per Request ☐ For Review ☐ Please Comment ☐ Please Reply

### Comments:

\* COPY OF ANNUAL STORM  
WATER INSPECTION REPORT.



CITY OF EL CAJON  
STORM WATER COMPLIANCE INSPECTION  
Inspected by D-Max Engineering, Inc.

Inspector Name C. BONNER Date 3/4/14 Time 9:30 AM / PM  
Type of Inspection: Result: ☒ Full Insp. ☐ Could not Contact ☐ Not Inventoried ☐ Moved, Vacant ☐ Refused  
☒ Routine ☐ Follow-up ☐ Moved, Replaced by ☐ Follow-up (i.e. not full)  
☐ Complaint Investigation ☐ Out of Jurisdiction ☐ Duplicate of: ☐ Mobile

A. CONTACT INFORMATION

Original Business Name VERIDIAM Changes  
Business Name \_\_\_\_\_  
Street Address 1717 N. CUYAMACA Street Address \_\_\_\_\_  
92020 ☐ change  
Responsible Person(s) TOM CRESANTE Responsible Person(s) GERALD CLOUTIER  
Title: OWNER Business Telephone # ( ) 596 ext. 5  
Business Telephone # (619) 596-4336 ext. 5 Business Fax # ( ) 448-1000  
Business Fax # (619) 562-1190  
Home Based? ☐ Yes ☒ No Mobile Business? ☐ Yes ☒ No  
Is this facility located in a multi-suite complex? ☐ Yes ☒ No  
Facility personnel present: DUANE HOLLANDER 596-4336  
FACILITY  
M160

B. FACILITY/SITE INFORMATION

Principal activity: MANUFACTURING

Assigned NAICS code(s) 3312 and/or SIC Code(s) 3312  
Does NAICS Code best represent principal activity: ☐ Yes ☐ No SIC? ☒ Yes ☐ No  
Recommended change of NAICS Code(s)? \_\_\_\_\_ Of SIC? \_\_\_\_\_

Existing NAICS code(s) \_\_\_\_\_ and SIC Code(s) \_\_\_\_\_

Status Update (if no longer active in City or does not need an inspection): ☐ Moved/Out of Business ☐ Duplicate  
☐ Not Inventoried ☐ Out of Jurisdiction

Does facility have a current business certificate? ☒ Yes ☐ No # 0084147 Exp. 12/31/14  
Is facility subject to CA Statewide General Industrial Permit? ☒ Mandatory ☐ Conditional ☐ No  
Does facility have a Notice of Non-Applicability (NONA/NEC)? ☐ Yes ☒ No  
Has facility filed a Notice of Intent (NOI) to obtain coverage? ☒ Yes ☐ No WDID: 9 3710 20299  
Has facility filed a Notice Of Termination (NOT) for the WDID# listed above? ☐ Yes ☒ No Approval date: \_\_\_\_\_  
Does facility maintain SWPPP or BMP Plan? ☒ Yes ☐ No  
Does facility have a storm water monitoring program? ☒ Yes ☐ No

C. INITIAL OBSERVATIONS

Approximate distance to receiving water body: ☒ < 200 ft. ☐ 200 - 1000 ft. ☐ > 1000 ft.

Discharge points: FIVE STORM DRAINS ON SITE; PERIMETER RUNOFF  
TO NATURAL CHANNEL

Approximate area covered by industrial or commercial activities: 6 ACRES square feet

Approximate % impervious surface of this area 90 %

Exposed areas of significant outdoor activity or storage? ☒ Permanent ☐ Occasional ☐ No



# D. BMP ASSESSMENT

BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
<b>D.1 General</b>					
Keep site free of litter, debris, and sediment using dry methods					
Keep parking lots, sidewalks, and streets free of sediment and debris using dry methods					
Keep outdoor areas free of spills and leaks		/			
Collect water from pressure washing or hosing and dispose of appropriately	/				Unknown Performed by:
Direct roof downspouts away from areas of potential pollutants		/			
Sewer lateral(s) maintenance		/			
Establish a regular schedule for private sewer lateral maintenance	/				
<b>D.2 Landscaping</b>					
Properly manage pesticides/fertilizer; use IPM when feasible		/			Unknown Landscaping Co:
Employ adequate erosion prevention measures (vegetation or physical stabilization)			/		
Minimize over watering/over-irrigation		/			
Properly store stockpiles to prevent material transport	/				
Properly store and dispose of green waste		/			Unknown
<b>D.3 Materials and Wastes</b>					
Protect trash area from contact with storm water		/			
Keep trash area free of litter and debris, liquids, powders, sediment		/			
Adequately cover materials stored outside				/	
Prevent run-on from contacting materials stored outdoors				/	
Properly label outdoor storage containers		/			
Provide an accessible, functional spill response kit		/			
Equip liquid storage containers with secondary containment		/			
Keep secondary containment free of spills and rainwater				/	
Properly store and dispose of hazardous materials	/				
Keep loading and unloading areas, including drains, free of debris				/	
Dispose of water generated by processing activities appropriately	/				
Dispose of pool, spa, fountain, and filter backwash water properly	/				Unknown Performed by:

BMPs	No Corrections Required		Corrections Required		Comments
	N/A	Fully Implemented	Partially Implemented	Not Implemented	
Clean floor mats in locations that do not drain to storm drain system	/				
<b>D.4 Equipment, Vehicles, and Outdoor Activities</b>					
Conduct outdoor activities within contained areas (garage, under canopy, work shop)				/	
Use drip pans to collect leaks/spills	/				
Drain fluids from all non-operational vehicles stored outdoors	/				
Vehicle and equipment fueling	/				
Provide materials (berm, mat, etc.) to protect storm drain inlets from spills and leaks	/				
Perform vehicle/equipment washing in a contained area where runoff does not enter the MS4	/				NOT ALLOWED ON SITE
<b>D.5 Other</b>					
Manage animals and animal waste in a manner that prevents animal waste from being transported in runoff	/				
Keep grease bin and area surrounding grease bin free of grease stains/spills	/				
Keep storm drain inlets free of grease and other food debris	/				
Identify and eliminate illicit connections and illegal discharges	/				
Provide storm water training for appropriate employees		/			
<b>D.6 ADDITIONAL REQUIRED ACTIONS</b>					
SEE ATTACHED CORRECTION LIST.					
<input type="checkbox"/> Based on inspection findings, it appears likely that significant levels of <u>METALS</u> would be present in storm water discharges from this site. Take action to reduce the levels of <u>"</u> to the maximum extent practicable. Treatment control BMPs are likely necessary.					
Owner/operator has been notified of recommended corrective actions both verbally and by: <input checked="" type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Fax					
Please refer to <a href="http://www.ci.el-cajon.ca.us/dept/works/stormwater.html">http://www.ci.el-cajon.ca.us/dept/works/stormwater.html</a> for more information on BMP implementation options.					
<b>D.7 Additional Questions</b>			<b>Comments/Results</b>		
Are there any potential air sources that could contribute to atmospheric deposition of pollutants?			<input type="checkbox"/> Painting <input type="checkbox"/> Sandblasting <input type="checkbox"/> Fuel Distribution <input type="checkbox"/> Dust dispersion or mineral processing <input type="checkbox"/> Metal smelting <input type="checkbox"/> Metal plating or anodizing <input type="checkbox"/> Chemical production or mixing <input type="checkbox"/> Large fuel burning device <input type="checkbox"/> Incinerator		
Does facility have a grease trap or grease interceptor?			<input type="checkbox"/> No <input type="checkbox"/> Grease Trap <input type="checkbox"/> Grease Interceptor <input type="checkbox"/> Unknown		
Are there any treatment control BMPs on-site?			<input type="checkbox"/> Filter insert <input type="checkbox"/> Hydrodynamic separator <input type="checkbox"/> Debris screen <input type="checkbox"/> Sewer diversion <input type="checkbox"/> Vegetated swale <input type="checkbox"/> Vegetated filter strip <input type="checkbox"/> Biofiltration <input type="checkbox"/> Detention/sedimentation basin <input type="checkbox"/> Containment and evaporation or reuse <input type="checkbox"/> Filtration		
Are treatment control BMPs regularly maintained?			<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> N/A		



What is the approximate percentage of the site that drains to the treatment control BMPs?	<input checked="" type="checkbox"/> N/A
Do major potential pollutant sources drain to treatment BMP(s)?	<input type="checkbox"/> All <input type="checkbox"/> Some <input type="checkbox"/> None <input checked="" type="checkbox"/> N/A
If any illicit connections and/or illegal discharges were identified have the appropriate authorities been notified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If any illicit connections and/or illegal discharges were identified, were they eliminated during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Were any non IC/ID related corrective actions implemented during the site visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Were any educational materials distributed?	NOI NONA/NEC IF IF-S SP SP-S IS IS-S AF AF-S DU DU-S MB

#### E. STATE GENERAL INDUSTRIAL PERMIT COMPLIANCE\*

- ☐ Non-compliance with the State Industrial Storm Water General Permit noted.
- ☐ In the future, under a new Industrial Permit, which has not yet been adopted, this facility may be able to qualify for exemption from Permit coverage based on no outdoor exposure.

#### SPECIFIC ACTION(S) REQUIRED TO CORRECT THE VIOLATION DESCRIBED ABOVE\*:

- ☐ File a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) to obtain coverage under the Industrial Permit—see Attachment 3 of the Industrial Permit ([www.waterboards.ca.gov/stormwtr/industrial.html](http://www.waterboards.ca.gov/stormwtr/industrial.html)).
- ☐ For "Conditional" facilities only: this site presently has outdoor exposure that requires filing for coverage under the Industrial Permit. If you implement all the recommended BMPs and eliminate outdoor exposure, you may be able to qualify for exemption from obtaining Industrial Permit coverage. Please contact the RWQCB for details.
- ☐ Develop and implement a Storm Water Pollution Prevention Plan (SWPPP)—see Section A of the Industrial Permit.
- ☐ Develop and implement a storm water monitoring program—see section B of the Industrial Permit for guidelines.
- ☐ Complete the provided Notice of Non-Applicability (NONA) and accompanying No Exposure Certification (NEC).

Additional notes and/or actions required:

#### F. CORRECTIVE ACTION SUMMARY

- ☒ Corrective Actions Required. Please refer to sections D.1-D.6 and E of this form
- ☐ No Corrective Actions Required at this Time.

#### G. RECOMMENDED CITY ACTIONS\*\*

Follow Up Inspection Priority: ☐ Priority 1 ☒ Priority 2 ☐ Priority 3

#### ASSESSMENT

Level of knowledge regarding stormwater issues: ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5

Level of cleanliness, BMP implementation, orderliness of site: ☐ 1 ☒ 2 ☐ 3 ☐ 4 ☐ 5

\*Please note that the Regional Water Quality Control Board (RWQCB) is the final arbiter of Industrial Permit compliance; please contact the RWQCB at (858) 467-2952 for details of what is necessary to comply with the Industrial Permit.

\*\*Recommended City actions listed at the time of inspection are subject to change based on later review by office staff.



**Veridiam**

**1717 N Cuyamaca St**

**Inspection Date : 3-4-14**

***Annual Storm Water Inspection Correction List:***

1. Provide hard cover for all metal waste containers stored outdoors
2. Install filter devices on all storm drain inlets
3. Repair pavement at outside fork lift storage area and along the front gate to prevent further soil erosion
4. Sweep all paved areas regularly of trash and debris
5. Properly dispose of water in secondary containment units and provide cover to prevent rain water intrusion
6. Provide cover for all outdoor work areas and material storage.
7. Update the facility storm water pollution prevention plan (SWPPP) to reflect the corrections and improvements



# CITY OF EL CAJON

200 Civic Center Way  
El Cajon, CA 92020

Citation No. 0327

☐ Building ☐ Planning  
☐ Fire ☒ Public Works  
STORMWATER

## ADMINISTRATIVE CITATION

☒ WARNING

☐ 1<sup>ST</sup> CITATION ☐ 2<sup>ND</sup> CITATION ☒ 3<sup>RD</sup> CITATION ☐ OTHER \_\_\_\_\_  
\$100 per violation \$200 per violation \$500 per violation \$ \_\_\_\_\_

PAYMENT OF \$ 0 IS DUE NO LATER THAN 0. (See reverse side for payment information.) PAYMENT DOES NOT EXCUSE CORRECTION OF THE VIOLATION.

CORRECTION OF THE VIOLATION(S) INDICATED BELOW MUST BE COMPLETED BY: 4-25-14  
(Date)

IF YOU FAIL TO CORRECT THE VIOLATION(S) BY THIS DATE, THE NEXT LEVEL OF CITATION MAY BE ISSUED.

PERSON CITED

CLOUTIER, GERARD P.  
GATE ANDY GR  
Last Name First M.I.

SAME AS BELOW.  
Mailing Address City / State Zip Code

1717 N. CUYAMACA EL CAJON  
Violation Address City

☐ Property Owner ☐ Tenant  
☐ Business Owner ☒ Other  
FACILITIES MANAGER CEO

Business Name VERIDIAM

397-110-48-00

Assessor's Parcel Number

Code Section Violated

Date of Violation

Description Of Violation

13.10.070 (B)	3-4-14	FAILURE TO INSTALL, IMPLEMENT AND MAINTAIN MINIMUM BEST MANAGEMENT PRACTICES (BMPs). TO PREVENT POLLUTANT DISCHARGE.
13.10.100(A)(C)		FAILURE TO INSTALL IMPLEMENT AND MAINTAIN (BMPs) FOR INDUSTRIAL DISCHARGERS.

☐ See attached for additional violations

Correction(s) Required

\*SEE ATTACHED CORRECTION SHEET.

Issuing Officer: C. BONNER

Phone: (619) 441-1663

Date Issued: 3-25-14

OFFICER AVAILABLE BY APPOINTMENT ONLY.

Signature of Person Cited: [Signature]

(Signing this citation acknowledges receipt only, and is not an admission of guilt)

Citation Served: ☐ In person to: GERARD CLOUTIER

☐ By Mail

☐ Posted on Property

☐ Other \_\_\_\_\_

SEE REVERSE SIDE FOR APPEAL RIGHTS AND OTHER IMPORTANT INFORMATION